

FILED

2013 AUG - 1 PM 4:11  
CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
BY:

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
June 2013 Grand Jury

CR13-0537

UNITED STATES OF AMERICA,  
Plaintiff,  
v.

No. I N D I C T M E N T

LEONEL LAREDO,  
aka "Wizard,"  
aka "Wiz,"  
aka "W,"  
aka "Leo,"  
aka "Brother-in-Law,"  
JESUS CERVANTES,  
aka "B-Bad,"  
aka "Jessica,"  
aka "Estela,"  
MARCOS LOPEZ,  
aka "Marcia,"  
aka "Monica,"  
HECTOR MARTINEZ,  
aka "Liar-Liar,"  
MARIANA LAREDO,  
VICTOR ESPINOZA,  
aka "Terco,"  
MAX MAESTAS,  
aka "Snow,"  
RENE JUAREZ,  
aka "Scrappy,"  
ALBERTO SIFUENTES,  
aka "Bluebird,"  
JAVIER MANUEL ULLOA,  
aka "Yogi,"

[18 U.S.C. § 1962(d): Racketeer  
Influenced and Corrupt  
Organizations Conspiracy; 18  
U.S.C. § 1959(a): Violent Crime  
in Aid of Racketeering; 21  
U.S.C. § 846: Conspiracy  
Distribute and Possess with  
Intent to Distribute  
Methamphetamine, Marijuana,  
Heroin, and Cocaine; 21 U.S.C.  
§§ 841(a)(1), 841(b)(1)(A)-(D):  
Distribution of, and Possession  
with Intent to Distribute,  
Methamphetamine, Marijuana,  
Heroin, and Cocaine; 18 U.S.C.  
§ 922(a)(1)(A): Engaging in the  
Business of Dealing in Firearms  
Without a License; 18 U.S.C.  
§ 922(g)(1): Felon in  
Possession of a Firearm and/or  
Ammunition; 18 U.S.C.  
§ 922(g)(5): Alien in  
Possession of a Firearm and/or  
Ammunition; 18 U.S.C.  
§ 922(g)(9): Domestic Violence  
Misdemeanor in Possession of  
Firearm and/or Ammunition;  
26 U.S.C. § 5861(d): Possession

1 CELINA ARANA,  
JESSENIA MEDINA,  
2 JOSE DORADO,  
aka "Yogi,"  
3 TANNOUS FAZAH,  
aka "Terist,"  
4 JOSUE ROJAS,  
aka "Chino,"  
5 JOSE GALVEZ,  
aka "Pecas,"  
6 EDUARDO AYALA,  
aka "Lalo,"  
7 ELEASAR ACOSTA,  
aka "Lucky,"  
8 JOSE GRANADOS,  
aka "Tricky,"  
9 JOSE CAZERES,  
aka "Pelon,"  
10 JOSE MANDUJANO,  
aka "Chuchi,"  
11 ARTURO MENDEZ,  
aka "Picachu,"  
12 OSCAR OLIVERA AVILA,  
aka "Ruben Ramirez,"  
13 aka "Oscar Olvera,"  
14 aka "Rigo Perez Suarez,"  
15 JOSE SANCHEZ,  
aka "Trouble,"  
16 JULIAN BECERRA,  
aka "Julio,"  
17 aka "Juan Pablo Perez,"  
18 JESSE BARRAZA,  
aka "Chapito,"  
19 aka "Chapo,"  
20 GISELLE CASADO,  
aka "Guera,"  
21 BEATRIZ TAVIRA,  
aka "Betty,"  
22 JESUS MEZA,  
aka "Chana,"  
23 HAYDEE MEDINA, and  
24 DAVID PROO,  
aka "D,"  
25

Defendants.

) of an Unregistered Firearm;  
) 18 U.S.C. § 1343: Wire Fraud;  
) 18 U.S.C. § 2: Aiding and  
) Abetting; 18 U.S.C. § 1963, 18  
) U.S.C. § 981(a)(1)(C), 21  
) U.S.C. §§ 853 and 881 and 28  
) U.S.C. § 2461(c): Criminal  
) Forfeiture]

TABLE OF CONTENTS

	<u>PAGE</u>
Introductory Allegations .....	4
A.    The Racketeering Enterprise .....	4
B.    Background of the F13 Gang .....	5
C.    Purposes of the Enterprise .....	9
D.    The Means and Methods of the Enterprise .....	10
Count One (18 U.S.C. § 1962(d)) .....	13
A.    Means by which the Object of the Conspiracy Was to be Accomplished .....	14
B.    Overt Acts .....	17
1.    Day-to-Day Management of the F13 Gang Criminal Enterprise .....	17
2.    The March 2010 Killing of Victim R.A. ....	47
3.    Drug Trafficking and Unlawful Possession of Firearms .....	50
4.    Smuggling of Drugs into the LACJ System .....	62
5.    Fraudulent Scheme to Obtain Free Telephone Service .....	68
C.    Special Sentencing Allegations .....	72
Counts Two and Three (18 U.S.C. § 1959(a)) .....	75
Count Four (21 U.S.C. § 846) .....	78
Counts Five through Twenty-Two (21 U.S.C. § 841) .....	82
Counts Twenty-Three through Forty-One (18 U.S.C. § 922) .....	100
Count Forty-Two (26 U.S.C. § 5861(d)) .....	111
Counts Forty-Three through Forty-Five (18 U.S.C. § 1343) .....	112
Forfeiture Allegations .....	116

1 The Grand Jury charges:

2 INTRODUCTORY ALLEGATIONS

3 A. THE RACKETEERING ENTERPRISE

4 1. At all times relevant to this Indictment, defendants  
5 LEONEL LAREDO, also known as ("aka") "Wizard," aka "Wiz," aka  
6 "W," aka "Leo," aka "Brother-in-Law" ("L. LAREDO"), JESUS  
7 CERVANTES, aka "B-Bad," aka "Jessica," aka "Estela"  
8 ("CERVANTES"), MARCOS LOPEZ, aka "Marcia," aka "Monica"  
9 ("LOPEZ"), HECTOR MARTINEZ, aka "Liar-Liar" ("MARTINEZ"),  
10 MARIANA LAREDO ("M. LAREDO"), VICTOR ESPINOZA, aka "Terco"  
11 ("ESPINOZA"), MAX MAESTAS, aka "Snow" ("MAESTAS"), RENE JUAREZ,  
12 aka "Scrappy" ("JUAREZ"), ALBERTO SIFUENTES, aka "Bluebird"  
13 ("SIFUENTES"), JAVIER MANUEL ULLOA, aka "Yogi" ("ULLOA"), CELINA  
14 ARANA ("ARANA"), JESSENIA MEDINA ("J. MEDINA"), JOSE DORADO, aka  
15 "Yogi" ("DORADO"), TANNOUS FAZAH, aka "Terist" ("FAZAH"), JOSE  
16 GALVEZ, aka "Pecas" ("GALVEZ"), EDUARDO AYALA, aka "Lalo"  
17 ("AYALA"), ELEASAR ACOSTA, aka "Lucky" ("ACOSTA"), JOSE  
18 GRANADOS, aka "Tricky" ("GRANADOS"), JOSE CAZERES, aka "Pelon"  
19 ("CAZERES"), JOSE MANDUJANO, aka "Chuchi" ("MANDUJANO"), ARTURO  
20 MENDEZ, aka "Picachu" ("MENDEZ"), OSCAR OLIVERA AVILA, aka  
21 "Ruben Ramirez," aka "Oscar Olvera," aka "Rigo Perez Suarez"  
22 ("AVILA"), JOSE SANCHEZ, aka "Trouble" ("SANCHEZ"), JULIAN  
23 BECERRA, aka "Julio," aka "Juan Pablo Perez" ("BECERRA"), JESSE  
24 BARRAZA, aka "Chapito," aka "Chapo" ("BARRAZA"), GISELLE CASADO,  
25 aka "Guera" ("CASADO"), and BEATRIZ TAVIRA, aka "Betty"  
26 ("TAVIRA") (collectively, "defendants"), and others known and  
27 unknown to the Grand Jury, were members and associates of a  
28 criminal organization engaged in, among other things, murder,

1 trafficking in narcotics and controlled substances, illegal  
2 gambling, wire fraud, and extortion. At all relevant times,  
3 this organization, known as the Florencia 13 criminal street  
4 gang (hereinafter, the "F13 Gang"), operated in the Central  
5 District of California and elsewhere. The F13 Gang, including  
6 its leadership, members, and associates, constituted an  
7 "enterprise," as that term is defined in Title 18, United  
8 States Code, Section 1961(4); that is, a group of individuals  
9 associated in fact, although not a legal entity, which is  
10 engaged in, and the activities of which affect, interstate and  
11 foreign commerce. The enterprise constitutes an ongoing  
12 organization whose members function as a continuing unit for a  
13 common purpose of achieving the objectives of the enterprise.

14 B. BACKGROUND OF THE F13 GANG

15 2. The F13 Gang is a multi-generational gang founded in  
16 Los Angeles, California in the early 1950s. The gang began as a  
17 small group of individuals who lived in and around the area of  
18 Florence Boulevard, in and near Los Angeles, California.  
19 Initially, the gang was primarily involved in street robberies,  
20 drug sales, and fighting with rival gang members in "turf  
21 battles." Through the years, however, the gang has dramatically  
22 increased its membership by absorbing smaller, less powerful  
23 local gangs.

24 3. There are at least 22 cliques, or subsets, of the F13  
25 Gang that together control an area of approximately three square  
26 miles in and around the unincorporated areas of South Los  
27 Angeles County. Examples of these cliques include the  
28 Gangsters, 64<sup>th</sup> Street, the Termites, the Tiny Locos, Bear

1 Street, the Malditos, and the HP (Huntington Park) Locos. The  
2 overall number of F13 Gang cliques has changed over the years as  
3 new cliques have been allowed to join the gang, and others have  
4 been expelled. While the F13 Gang's "territory" therefore has  
5 changed over time, it is generally understood to be contained  
6 within the area bordered by the 10 freeway to the North,  
7 Imperial Highway to the South, the 110 freeway to the West, and  
8 the 710 freeway to the East; and it now includes at least the  
9 unincorporated Florence-Firestone neighborhood (also known as  
10 Florence-Graham) and parts of several nearby cities, such as  
11 Huntington Park, South Gate, Maywood, Bell, and Lynwood. Based  
12 on the strength of its numbers and its reputation for violence,  
13 the F13 Gang controls drug trafficking and other illegal  
14 activities within this territory.

15 4. The F13 Gang is continually engaged in the  
16 distribution of multiple controlled substances, including, but  
17 not limited to, methamphetamine. In addition to supplying drug-  
18 using customers, members and associates of the gang regularly  
19 sell distributable amounts of drugs to each other and to others  
20 who they believe to be "street-level" drug dealers. F13 Gang  
21 members and associates also engage in efforts to smuggle  
22 controlled substances into California State Prisons and the Los  
23 Angeles County Jail ("LACJ") system.

24 5. To support their drug trafficking and to maintain  
25 control over their claimed "territory," F13 Gang members and  
26 associates maintain a ready supply of firearms, including  
27 handguns, shotguns, rifles, and machineguns. They also sell  
28 these weapons for profit, using the proceeds from such sales to

1 purchase drugs and additional firearms, or to pay the required  
2 tribute to members of the Mexican Mafia, as discussed below.  
3 Such weapons are frequently stolen or unregistered to make it  
4 difficult to connect them to the gang member who either used the  
5 weapon or obtained it. Firearms also are often discarded or  
6 destroyed after being used to commit acts of violence on behalf  
7 of the enterprise, so continued gun trafficking ensures that the  
8 gang maintains ready access to firearms in the future. At the  
9 same time, being publicly known to sell, and therefore possess,  
10 numerous firearms serves the additional purpose of supporting  
11 the F13 Gang's reputation for violence and intimidation.

12 6. The F13 Gang is controlled by members and associates  
13 of the "Mexican Mafia," or "La Eme." The Mexican Mafia is an  
14 organized group of individuals that controls much of the drug  
15 distribution and other criminal activities within California  
16 State Prisons, local county jails, and some federal prisons.  
17 Members of the Mexican Mafia come from the ranks of local street  
18 gangs, including the F13 Gang. In return for allowing these  
19 local street gangs to maintain control over their purported  
20 territories and for protecting the gangs' members and associates  
21 once they enter prison or jail, the Mexican Mafia requires the  
22 gangs to collect and pay "taxes" on all drug trafficking and  
23 other illegal activities taking place in those territories  
24 (hereinafter, "extortionate taxes"). These illicit funds are  
25 intended to be controlled by, and are often held in trust by  
26 gang members and associates for, the Mexican Mafia member(s) in  
27 charge of a particular area. Members and associates of the F13  
28 Gang, therefore, regularly pay extortionate taxes to the

1 incarcerated Mexican Mafia member(s) who oversee the gang; and  
2 the collection of extortionate taxes from drug dealers and  
3 others engaging in criminal activities within the F13 Gang's  
4 territory is a primary task of the gang's leadership on the  
5 streets, as is punishing individuals who fail to pay the  
6 requisite extortionate taxes.

7       7. Unindicted co-conspirator Arturo Castellanos, aka  
8 "Tablas," aka "T" ("Castellanos"), is a Mexican Mafia member and  
9 the undisputed leader of the F13 Gang. Castellanos is serving a  
10 term of life imprisonment without the possibility of parole in  
11 Pelican Bay State Prison. In 2004, Castellanos issued written  
12 "reglas," or rules, from his prison cell at Pelican Bay State  
13 Prison that were intended to govern all F13 Gang members and  
14 associates. By way of these rules and later directives,  
15 Castellanos commanded certain senior gang members and other  
16 select individuals to assume leadership positions within the F13  
17 Gang's "territory." These "shot callers" were then ordered to  
18 coordinate the illegal distribution of drugs and other criminal  
19 activities, to ensure that extortionate taxes were collected,  
20 and otherwise to oversee their respective portions of the gang's  
21 territory, such as by resolving disputes both among F13 Gang  
22 members and associates and with members of other Los Angeles  
23 gangs. Shot callers were likewise charged with exposing and  
24 punishing F13 Gang members, as well as others residing in F13  
25 Gang-controlled territory, who were identified as having  
26 cooperated with law enforcement.

27       8. In 2007, numerous members and associates of the F13  
28 Gang were indicted by a Federal Grand Jury. Following the



1 subsequent conviction and imprisonment of many of the gang's  
2 senior members, a leadership vacuum was created. After a brief  
3 transitional period, defendants CERVANTES and LOPEZ became the  
4 F13 Gang's two primary shot callers in or around early 2009; and  
5 they assumed control of the gang's territory in South Los  
6 Angeles County on behalf of Castellanos. Thereafter, defendant  
7 L. LAREDO, who had been a cellmate of Castellanos, was chosen by  
8 Castellanos to become the operational leader of the F13 Gang.  
9 As such, defendant L. LAREDO became the gang's second-in-  
10 command; and he communicated with defendants CERVANTES and  
11 LOPEZ from inside Pelican Bay State Prison, where L. LAREDO was  
12 incarcerated, to oversee all criminal activities being committed  
13 by F13 Gang members and associates.

14 9. The members of the leadership of the F13 Gang who are  
15 incarcerated are able to disseminate instructions to the gang's  
16 membership and to maintain control over drug trafficking and  
17 other criminal activities within the gang's territory in and  
18 around South Los Angeles County through arranged visits by gang  
19 associates (generally female) to defendant L. LAREDO and  
20 Castellanos in Pelican Bay State Prison, via coded instructions  
21 written in letters and "kites" (that is, notes passed among  
22 inmates in custodial facilities), and, when possible, by  
23 telephone calls from inmates to out-of-custody members and  
24 associates (i.e., "jail calls").

25 C. PURPOSES OF THE ENTERPRISE

26 10. The purposes of the F13 Gang criminal enterprise  
27 include, but are not limited to, the following:

28 ///

1           a.     Enriching Castellanos and defendant L. LAREDO  
2 through, among other things, the remittance of the proceeds of  
3 extortionate taxes to family members, friends, and associates of  
4 these two top leaders of the F13 Gang.

5           b.     Enriching the members and associates of the F13  
6 Gang through, among other things, the control of and  
7 participation in the trafficking of controlled substances and  
8 firearms in F13 Gang territory and elsewhere, the operation of  
9 illegal gambling establishments (hereinafter referred to as  
10 "casitas"), and the collection of extortionate taxes.

11          c.     Smuggling controlled substances to F13 Gang  
12 members and associates housed in California State Prisons and  
13 the LACJ system to be distributed to incarcerated individuals.

14          d.     Enabling incarcerated F13 Gang members and  
15 associates to fraudulently obtain access to telephone services  
16 in order to aid their efforts to smuggle drugs and otherwise to  
17 conduct criminal activities.

18          e.     Maintaining control over all F13 Gang territory.

19          f.     Preserving, protecting, and expanding the power  
20 of the F13 Gang through the use of intimidation, violence,  
21 threats of violence, assault, and murder.

22 D.     THE MEANS AND METHODS OF THE ENTERPRISE

23         11.     The means and methods by which the defendants and  
24 other members and associates of the F13 Gang criminal enterprise  
25 conduct and participate in the conduct of the affairs of the F13  
26 Gang include:

27           a.     Members and associates of the F13 Gang commit,  
28 attempt to commit, conspire to commit, and threaten to commit

1 acts of violence, including, without limitation, murder,  
2 assaults, intimidation, and extortion, to preserve, protect, and  
3 expand the enterprise's criminal operations.

4           b. Members and associates of the F13 Gang promote a  
5 climate of fear through acts of violence and threats to commit  
6 acts of violence.

7           c. Leaders of the F13 Gang disseminate rules and  
8 orders to be followed by all participants in the F13 Gang  
9 criminal enterprise.

10           d. Members and associates of the F13 Gang use the  
11 enterprise to commit, attempt to commit, and threaten to commit  
12 acts of violence, including, without limitation, murder and  
13 assaults, to promote discipline and enforce the rules of the F13  
14 Gang.

15           e. Members and associates of the F13 Gang engage in  
16 the trafficking of controlled substances and firearms, as well  
17 as the collection of extortionate taxes, in order to generate  
18 income for the enterprise.

19           f. Members and associates of the F13 Gang, with the  
20 permission of the gang's leaders, "tax" drug sales, firearms  
21 trafficking, and other profitable illegal activity within F13  
22 Gang-controlled territory in order to generate income and  
23 control the criminal activity undertaken within such territory.

24           g. Leaders and shot callers within the F13 Gang  
25 criminal enterprise control the collection and payment of  
26 extortionate taxes to the Mexican Mafia in order to preserve,  
27 protect, and expand the enterprise's control of criminal  
28 activity undertaken within its territory and to ensure the

1 protection of F13 Gang members and associates who are  
2 incarcerated.

3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

COUNT ONE

[18 U.S.C. § 1962(d)]

1. Paragraphs One through Eleven of the Introductory Allegations are hereby re-alleged and incorporated by reference as though fully set forth herein.

2. Beginning on a date unknown to the Grand Jury, and continuing to on or about August 1, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendants L. LAREDO, CERVANTES, LOPEZ, MARTINEZ, M. LAREDO, ESPINOZA, MAESTAS, JUAREZ, SIFUENTES, ULLOA, ARANA, J. MEDINA, DORADO, FAZAH, GALVEZ, AYALA, ACOSTA, GRANADOS, CAZERES, MANDUJANO, MENDEZ, AVILA, SANCHEZ, BECERRA, BARRAZA, CASADO, and TAVIRA, and others known and unknown to the Grand Jury, being persons employed by and associated with the F13 Gang criminal enterprise described in Paragraphs One through Eleven of the Introductory Allegations of this Indictment, which constitutes an "enterprise," as defined in Title 18, United States Code, Section 1961(4), which enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:

(a) the distribution of, possession with intent to distribute, and conspiracy to distribute and/or possess with

1 intent to distribute, controlled substances, in violation of  
2 Title 21, United States Code, Sections 841(a)(1), 843(b), and  
3 846;

4 (b) murder, in violation of California Penal Code Sections  
5 21a, 31, 182, 187, 189, 190, and 664; and

6 (c) extortion, in violation of California Penal Code  
7 Sections 31, 182, 518, 519, 520, 664;

8 and multiple acts indictable under:

9 (d) Title 18, United States Code, Section 1955 (illegal  
10 gambling); and

11 (e) Title 18, United States Code, Section 1343 (wire  
12 fraud).

13 It was a further part of the conspiracy that each defendant  
14 agreed that a conspirator would commit at least two acts of  
15 racketeering in the conduct of the affairs of the enterprise.

16 A. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE  
17 ACCOMPLISHED

18 The object of the conspiracy was to be accomplished, in  
19 substance, as follows:

20 1. Castellanos and defendant L. LAREDO, from within  
21 Pelican Bay State Prison, would exercise leadership over the F13  
22 Gang on behalf of the Mexican Mafia by issuing rules and orders  
23 to defendants CERVANTES and LOPEZ, and others known and unknown  
24 to the Grand Jury, regarding, among other things, the collection  
25 of extortionate taxes and who held positions of authority within  
26 the criminal enterprise out on the streets.

27 2. Defendants CERVANTES, LOPEZ, MARTINEZ, M. LAREDO, and  
28 CASADO, and others known and unknown to the Grand Jury, would

1 correspond in writing with Castellanos, defendant L. LAREDO,  
2 and/or other inmates at Pelican Bay State Prison in order to  
3 receive direction regarding the business of the F13 Gang  
4 criminal enterprise.

5 3. Defendants CASADO and TAVIRA, and others known and  
6 unknown to the Grand Jury, would visit Castellanos, defendant L.  
7 LAREDO, and/or other inmates incarcerated at Pelican Bay State  
8 Prison in order to relay messages to and from other F13 Gang  
9 members and associates.

10 4. Defendants CERVANTES, LOPEZ, MARTINEZ, and ULLOA, and  
11 others known and unknown to the Grand Jury, would direct drug  
12 trafficking, acts of violence, and other criminal activities of  
13 the enterprise within the territory controlled by the F13 Gang,  
14 as well as supervise the collection of extortionate taxes and  
15 mediate disputes both among the gang's members and associates  
16 and with members of other gangs.

17 5. Defendants CERVANTES, LOPEZ, MARTINEZ, MAESTAS,  
18 JUAREZ, SIFUENTES, ULLOA, DORADO, MANDUJANO, MENDEZ, and AVILA,  
19 and others known and unknown to the Grand Jury, would supply F13  
20 Gang members and associates with distributable amounts of  
21 controlled substances, including, but not limited to,  
22 methamphetamine, marijuana, heroin, and cocaine.

23 6. Defendants JUAREZ and SIFUENTES would sell firearms,  
24 including machineguns, shotguns, rifles, and handguns, to  
25 members and associates of the F13 Gang.

26 7. Defendants CERVANTES, LOPEZ, ESPINOZA, JUAREZ,  
27 SIFUENTES, FAZAH, MANDUJANO, AVILA, and SANCHEZ would possess

28 ///

1 firearms and ammunition in order to further the drug trafficking  
2 and other criminal activities of the enterprise.

3 8. Defendants M. LAREDO, BECERRA, and BARRAZA would  
4 assist other members of the enterprise by, among other things,  
5 distributing and storing illegal controlled substances.

6 9. Defendants CERVANTES, MAESTAS, GRANADOS, CAZERES,  
7 MENDEZ, AVILA, and SANCHEZ, and others known and unknown to the  
8 Grand Jury, would operate "casitas" within the territory  
9 controlled by the F13 Gang and elsewhere, from which F13 Gang  
10 members and associates could distribute illegal controlled  
11 substances and engage in other illegal activities, including  
12 illegal gambling.

13 10. Defendants CERVANTES, LOPEZ, MARTINEZ, ESPINOZA,  
14 MAESTAS, ULLOA, DORADO, and FAZAH, and others known and unknown  
15 to the Grand Jury, would participate in the disciplining of  
16 members and associates of the F13 Gang - or others who are  
17 deemed to have interfered with the gang's criminal activities -  
18 including, without limitation, through the planning of assaults  
19 and murders of such individuals.

20 11. Defendants LOPEZ, MARTINEZ, ULLOA, ARANA, DORADO,  
21 FAZAH, GALVEZ, and AYALA, and others known and unknown to the  
22 Grand Jury, would participate in efforts by F13 Gang members and  
23 associates to smuggle controlled substances, such as  
24 methamphetamine, marijuana, heroin, and cocaine, into California  
25 State Prisons and the LACJ system, specifically including the  
26 North County Correctional Facility located in Castaic,  
27 California (hereinafter, "NCCF").  
28



1           12. Defendants CERVANTES, LOPEZ, MARTINEZ, M. LAREDO,  
2           ESPINOZA, MAESTAS, JUAREZ, ULLOA, ACOSTA, GRANADOS, and CASADO  
3           would collect extortionate taxes from the sales of controlled  
4           substances, firearms trafficking, and other profitable illegal  
5           activities within F13 Gang-controlled territory.

6           13. Defendants ULLOA, ARANA, and J. MEDINA, and others  
7           known and unknown to the Grand Jury, would participate in a  
8           fraudulent scheme involving the use of false identities to  
9           obtain free telephone service for members and associates of the  
10          F13 Gang.

11          B.    OVERT ACTS

12           In furtherance of the racketeering conspiracy and to  
13          accomplish the object of the racketeering conspiracy, defendants  
14          L. LAREDO, CERVANTES, LOPEZ, MARTINEZ, M. LAREDO, ESPINOZA,  
15          MAESTAS, JUAREZ, SIFUENTES, ULLOA, ARANA, J. MEDINA, DORADO,  
16          FAZAH, GALVEZ, AYALA, ACOSTA, GRANADOS, CAZERES, MANDUJANO,  
17          MENDEZ, AVILA, SANCHEZ, BECERRA, BARRAZA, CASADO, and TAVIRA,  
18          and others known and unknown to the Grand Jury, committed and  
19          caused to be committed various overt acts, on or about the  
20          following dates, within the Central District of California, and  
21          elsewhere, including, but not limited to, the following:

22           Day-to-Day Management of the F13 Gang Criminal Enterprise

23           1.    On January 11, 2009, defendant L. LAREDO, using coded  
24          language in correspondence, told an unindicted co-conspirator  
25          that L. LAREDO was waiting for notification as to whether he had  
26          become an official member of the Mexican Mafia.

27           2.    On June 11, 2009, defendant L. LAREDO, using coded  
28          language in correspondence, instructed an unindicted co-

1 conspirator to follow up with defendants CERVANTES, LOPEZ, and  
2 M. LAREDO regarding correspondence L. LAREDO sent to each of  
3 them.

4 3. On September 13, 2009, defendant L. LAREDO, using  
5 coded language in correspondence, directed an unindicted co-  
6 conspirator to call defendants CERVANTES and LOPEZ and to  
7 inquire whether they received L. LAREDO's most recent  
8 correspondence.

9 4. On December 14, 2009, defendant JUAREZ, speaking in  
10 coded language during a telephone conversation with defendant  
11 LOPEZ, inquired as to the status of an unindicted Mexican Mafia  
12 member and stated that LOPEZ would know due his status as a shot  
13 caller for the F13 Gang.

14 5. On December 14, 2009, defendant LOPEZ, speaking in  
15 coded language over the telephone, advised defendant JUAREZ that  
16 LOPEZ had received a message from Castellanos and defendant L.  
17 LAREDO regarding an unindicted Mexican Mafia member and another  
18 unidentified individual, and directed JUAREZ not to get involved  
19 in gang politics within the LACJ system.

20 6. On January 15, 2010, defendant SIFUENTES, speaking in  
21 coded language, advised a confidential informant ("CI-1") that  
22 Castellanos, who was incarcerated, was in charge of the criminal  
23 activities of the F13 Gang on the streets and that SIFUENTES was  
24 part of Castellanos's criminal organization.

25 7. On January 15, 2010, defendant SIFUENTES, speaking in  
26 coded language over the telephone, informed a CI-1 that  
27 incarcerated Mexican Mafia members, like Castellanos, have shot  
28 callers who represent them on the streets.

1           8.    On January 28, 2010, defendant ESPINOZA, speaking in  
2 coded language over the telephone, asked defendant SIFUENTES  
3 whether an unindicted co-conspirator was the shot caller for the  
4 F13 Gang in charge of Huntington Park, California.

5           9.    On January 28, 2010, defendant SIFUENTES, speaking in  
6 coded language over the telephone, advised defendant ESPINOZA  
7 that an unindicted co-conspirator was not one of the F13 Gang's  
8 shot callers and that anyone who wanted to know who was in  
9 charge of Huntington Park for the gang could call SIFUENTES.

10          10.   On January 29, 2010, defendant ESPINOZA, speaking in  
11 coded language over the telephone, told defendant SIFUENTES that  
12 an unindicted co-conspirator should be assaulted as punishment  
13 if he is incorrectly claiming to be a shot caller of the F13  
14 Gang.

15          11.   On February 17, 2010, defendant ULLOA, speaking in  
16 coded language over the telephone, instructed defendant DORADO  
17 to assault an F13 Gang member.

18          12.   On February 17, 2010, defendant DORADO, speaking in  
19 coded language during a telephone conversation with defendant  
20 ULLOA, agreed to assault an F13 Gang member.

21          13.   On February 17, 2010, defendant ULLOA, speaking in  
22 coded language over the telephone, told an unindicted co-  
23 conspirator that defendant ARANA serves as an intermediary for  
24 ULLOA and that she would immediately relay any information she  
25 received to ULLOA.

26          14.   On February 17, 2010, defendant LOPEZ, speaking in  
27 coded language over the telephone, informed defendant ULLOA that  
28 LOPEZ had taken care of a problem relating to the F13 Gang by

1 contacting defendant L. LAREDO, who would be sending  
2 instructions to incarcerated members of the gang.

3 15. On February 17, 2010, defendant LOPEZ, speaking in  
4 coded language over the telephone, advised defendant ULLOA that  
5 an Armenian inmate was to be protected while in custody at NCCF.

6 16. On February 18, 2010, defendant ARANA, speaking in  
7 coded language over the telephone, relayed to defendant ULLOA  
8 the name of the Armenian inmate who was to be protected while in  
9 custody at NCCF, which had been provided to ARANA by defendant  
10 LOPEZ.

11 17. On February 18, 2010, defendant ULLOA, speaking in  
12 coded language over the telephone, told defendant LOPEZ that  
13 ULLOA would make sure that an Armenian inmate would be protected  
14 at NCCF and that ULLOA would discipline anyone who bothered the  
15 inmate.

16 18. On February 18, 2010, defendant ULLOA, speaking in  
17 coded language over the telephone, asked an unindicted co-  
18 conspirator to spread the word to other inmates at NCCF that  
19 ULLOA wanted an Armenian inmate to be protected while in custody  
20 at that facility.

21 19. On February 19, 2010, defendant ULLOA, speaking in  
22 coded language over the telephone, informed defendant LOPEZ that  
23 ULLOA had asked the inmate in charge of an NCCF dormitory to  
24 protect an Armenian inmate who was housed there and that ULLOA  
25 had just spoken to defendant CERVANTES.

26 20. On February 22, 2010, an unindicted co-conspirator,  
27 speaking in coded language over the telephone, reported to  
28 defendant ULLOA that an incarcerated gang member who ULLOA and

1 the unindicted co-conspirator had wanted disciplined had been  
2 assaulted.

3 21. On February 22, 2010, defendant ULLOA, speaking in  
4 coded language over the telephone, confirmed to defendant ARANA  
5 that an incarcerated gang member had been violently disciplined.

6 22. On February 24, 2010, defendant ULLOA, speaking in  
7 coded language over the telephone, told defendant LOPEZ that  
8 ULLOA would be incarcerated for a couple more years and would  
9 continue to make money during that time by trafficking drugs  
10 inside NCCF.

11 23. On February 26, 2010, an unindicted co-conspirator,  
12 speaking in coded language over the telephone, alerted defendant  
13 ULLOA that an incarcerated gang member had been telling other  
14 inmates that ULLOA and his associates were cooperating with law  
15 enforcement.

16 24. On March 14, 2010, defendant ULLOA, speaking in coded  
17 language over the telephone, instructed defendant ARANA to relay  
18 a message to an unindicted co-conspirator to have a member of  
19 the 18<sup>th</sup> Street gang assaulted.

20 25. On March 18, 2010, defendant ULLOA, speaking in coded  
21 language over the telephone, advised defendant ARANA that  
22 defendant CERVANTES outranked defendant LOPEZ within the power  
23 structure of the F13 Gang.

24 26. On April 8, 2010, defendant LOPEZ, speaking in coded  
25 language over the telephone, advised an unindicted co-  
26 conspirator who had inquired about the status of a recently-  
27 incarcerated individual that LOPEZ could quickly find out what  
28 was happening with the individual in custody.

1        27. On April 8, 2010, defendant LOPEZ, speaking in coded  
2 language over the telephone, instructed an unindicted co-  
3 conspirator to tell an inmate in a state prison facility that  
4 the inmate could communicate with LOPEZ using the unindicted co-  
5 conspirator as an intermediary.

6        28. On April 15, 2010, defendant MARTINEZ, speaking in  
7 coded language over the telephone, told defendant LOPEZ that an  
8 unindicted co-conspirator owed MARTINEZ money for the sale of  
9 controlled substances.

10       29. On April 15, 2010, defendant MARTINEZ, speaking in  
11 coded language over the telephone, advised defendant LOPEZ that  
12 MARTINEZ only just now received drugs to sell and would not be  
13 able to pay extortionate taxes.

14       30. On April 15, 2010, defendant LOPEZ, speaking in coded  
15 language over the telephone, instructed defendant MARTINEZ to  
16 collect proceeds of drug sales from an unindicted co-  
17 conspirator, which would be taken by LOPEZ and others.

18       31. On April 15, 2010, defendant MARTINEZ, speaking in  
19 coded language over the telephone, told defendant LOPEZ that  
20 MARTINEZ was paid back the money he had been owed by an  
21 unindicted co-conspirator and that MARTINEZ was going to meet  
22 LOPEZ right now.

23       32. On April 15, 2010, defendant MARTINEZ, speaking in  
24 coded language over the telephone, asked defendant LOPEZ if  
25 LOPEZ had received authorization to discipline an unknown  
26 individual.

27       33. On April 15, 2010, defendant LOPEZ, speaking in coded  
28 language over the telephone, informed defendant MARTINEZ that

1 LOPEZ had spoken to an unindicted co-conspirator and received  
2 approval for an unknown individual to be disciplined.

3 34. On April 15, 2010, defendant LOPEZ, speaking in coded  
4 language over the telephone, reminded defendant MARTINEZ that an  
5 unindicted co-conspirator from Ironwood State Prison who sought  
6 to purchase heroin from them would have to pay extortionate  
7 taxes to LOPEZ.

8 35. On April 21, 2010, defendant L. LAREDO, using coded  
9 language in correspondence, advised defendant LOPEZ that L.  
10 LAREDO was aware that collections of extortionate taxes were not  
11 going well and that L. LAREDO expected these collections to  
12 improve.

13 36. On April 21, 2010, defendant L. LAREDO, using coded  
14 language in correspondence, instructed defendant LOPEZ to have  
15 defendant CERVANTES meet with any F13 Gang members who were not  
16 making sufficient extortionate tax payments.

17 37. On May 7, 2010, defendant LOPEZ, speaking in coded  
18 language over the telephone, asked defendant MAESTAS to contact  
19 a member of the 18<sup>th</sup> Street gang who had attempted to meet with  
20 defendant ESPINOZA at ESPINOZA's store located on Pacific  
21 Boulevard, in Huntington Park, California, within the territory  
22 controlled by the F13 Gang.

23 38. On May 7, 2010, defendant MAESTAS, speaking in coded  
24 language during a telephone conversation with defendant LOPEZ,  
25 agreed to contact an 18<sup>th</sup> Street gang member who had attempted to  
26 meet with defendant ESPINOZA and assured LOPEZ that MAESTAS  
27 would resolve the gang member's problem.

1           39. On May 7, 2010, defendant LOPEZ, speaking in coded  
2 language over the telephone, asked defendant GRANADOS whether he  
3 knew an unindicted co-conspirator who had an "F13" tattoo on her  
4 face.

5           40. On May 7, 2010, defendant GRANADOS, speaking in coded  
6 language over the telephone, told defendant LOPEZ that an  
7 unindicted co-conspirator who was using GRANADOS's name to give  
8 orders, without authorization, needed to be disciplined.

9           41. On May 8, 2010, defendant ACOSTA, speaking in coded  
10 language over the telephone from a state prison facility,  
11 informed defendant LOPEZ that ACOSTA had collected \$1,150 in  
12 extortionate taxes for LOPEZ.

13           42. On May 8, 2010, defendant LOPEZ, speaking in coded  
14 language over the telephone, directed defendant ACOSTA to have  
15 extortionate tax payments collected from within the state prison  
16 facility in which ACOSTA was incarcerated delivered directly to  
17 LOPEZ.

18           43. On May 8, 2010, defendant ACOSTA, speaking in coded  
19 language over the telephone, informed defendant LOPEZ that  
20 ACOSTA might lose the use of his cellular telephone in prison  
21 because the inmates were expecting correctional officers to  
22 search their cells soon.

23           44. On May 8, 2010, defendant ACOSTA, speaking in coded  
24 language over the telephone from a state prison facility,  
25 confirmed with defendant LOPEZ that an unindicted co-conspirator  
26 would deliver extortionate tax proceeds to LOPEZ that same day.

27           45. On May 8, 2010, defendant MARTINEZ, speaking in coded  
28 language over the telephone, informed defendant LOPEZ that an



1 individual was causing a disruption at defendant ESPINOZA's  
2 store located on Pacific Boulevard, in Huntington Park,  
3 California, within the territory controlled by the F13 Gang.

4 46. On May 8, 2010, defendant LOPEZ, speaking in coded  
5 language over the telephone, instructed defendant MARTINEZ to  
6 assault an individual who was causing a disruption at defendant  
7 ESPINOZA's store.

8 47. On May 8, 2010, defendant MARTINEZ, speaking in coded  
9 language during a telephone conversation with defendant LOPEZ,  
10 agreed to assault an individual who was causing a disruption at  
11 defendant ESPINOZA's store.

12 48. On May 8, 2010, defendant MARTINEZ, speaking in coded  
13 language over the telephone, apprised defendant LOPEZ of the  
14 presence of law enforcement officers in the vicinity of  
15 defendant ESPINOZA's store, but noted that the individual who  
16 had caused a disruption at ESPINOZA's store needed to be  
17 assaulted.

18 49. On May 8, 2010, defendant MARTINEZ, speaking in coded  
19 language during a telephone conversation with defendant LOPEZ,  
20 explained that MARTINEZ had instructed defendant ESPINOZA to  
21 assault an individual who had been was causing a disruption at  
22 ESPINOZA's store if the disruptive behavior continued.

23 50. On May 9, 2010, defendant ACOSTA, speaking in coded  
24 language over the telephone, reported to defendant LOPEZ that  
25 ACOSTA was having trouble collecting extortionate taxes within  
26 the state prison in which he was housed.

27 51. On May 9, 2010, defendant ACOSTA, speaking in coded  
28 language over the telephone from a state prison facility, told

1 defendant LOPEZ that LOPEZ would receive \$600 in extortionate  
2 taxes that same day.

3 52. On May 9, 2010, defendant ACOSTA, using a telephone  
4 from a state prison facility, read a letter from another inmate  
5 regarding the F13 Gang to defendant LOPEZ.

6 53. On May 9, 2010, defendant ACOSTA, speaking in coded  
7 language over the telephone from a state prison facility,  
8 explained to defendant LOPEZ that a letter from another inmate  
9 was suggesting that LOPEZ had allowed other Mexican Mafia  
10 members to gain influence in custodial facilities under the  
11 control of Castellanos.

12 54. On May 9, 2010, defendant ACOSTA, speaking in coded  
13 language during a telephone conversation with defendant LOPEZ,  
14 explained that ACOSTA had read a letter from another inmate and,  
15 realizing the message it contained was incorrect, knew he had to  
16 bring it to the attention of LOPEZ.

17 55. On May 9, 2010, defendant ACOSTA, speaking in coded  
18 language over the telephone from a state prison facility,  
19 informed defendant LOPEZ that ACOSTA had a way of smuggling  
20 contraband into the state prison in which ACOSTA was  
21 incarcerated.

22 56. On May 9, 2010, defendant ACOSTA, speaking in coded  
23 language over the telephone from a state prison facility, told  
24 defendant LOPEZ that communication from the prison in which  
25 ACOSTA was housed was limited because correctional officers had  
26 confiscated inmates' cellular telephones.

27 57. On May 9, 2010, defendant ACOSTA, speaking in coded  
28 language over the telephone from a state prison facility,

1 reported to defendant LOPEZ that ACOSTA possessed confirmation  
2 numbers for wired payments of extortionate taxes, but that the  
3 payments had been directed to defendant CASADO.

4 58. On May 11, 2010, defendant LOPEZ, speaking in coded  
5 language over the telephone, asked defendant GRANADOS to inquire  
6 whether an unindicted co-conspirator knew a particular  
7 individual from the "Maywood Locos" gang.

8 59. On May 13, 2010, defendant MAESTAS, speaking in coded  
9 language over the telephone, apprised defendant LOPEZ of the  
10 status of an unindicted co-conspirator who owed extortionate  
11 taxes.

12 60. On May 13, 2010, defendant MAESTAS, speaking in coded  
13 language over the telephone, told defendant LOPEZ that the  
14 following day MAESTAS would pressure an unindicted co-  
15 conspirator to pay extortionate taxes.

16 61. On May 13, 2010, an unindicted co-conspirator,  
17 speaking in coded language over the telephone, informed  
18 defendant LOPEZ that defendant ESPINOZA had collected  
19 extortionate taxes.

20 62. On May 18, 2010, defendant LOPEZ, speaking in coded  
21 language over the telephone, confirmed to defendant MARTINEZ  
22 that LOPEZ would meet with MARTINEZ and defendant SIFUENTES  
23 shortly.

24 63. On May 19, 2010, defendant LOPEZ, speaking in coded  
25 language over the telephone, informed defendant CERVANTES that  
26 LOPEZ had received inmate correspondence from Pelican Bay State  
27 Prison, including a letter from defendant L. LAREDO.  
28

1           64. On May 19, 2010, defendant LOPEZ, speaking in coded  
2 language during a telephone conversation with defendant  
3 CERVANTES, explained that one of the inmate letters LOPEZ had  
4 received inquired as to why CERVANTES had not responded to  
5 correspondence from members of the Mexican Mafia.

6           65. On May 19, 2010, defendant LOPEZ, speaking in coded  
7 language over the telephone, advised defendant CERVANTES that  
8 Castellanos and defendant L. LAREDO believed that LOPEZ and  
9 CERVANTES were not working together to run the F13 Gang.

10          66. On May 19, 2010, defendant LOPEZ, speaking in coded  
11 language over the telephone, told defendant CERVANTES that  
12 defendant M. LAREDO had complained about LOPEZ's leadership of  
13 the F13 Gang.

14          67. On May 19, 2010, defendant LOPEZ, speaking in coded  
15 language during a telephone conversation with defendant  
16 CERVANTES, recounted advising defendant M. LAREDO that defendant  
17 L. LAREDO should communicate with LOPEZ directly and that L.  
18 LAREDO had four different addresses to which he could send  
19 letters for LOPEZ.

20          68. On May 19, 2010, defendant CERVANTES, speaking in  
21 coded language over the telephone, told defendant LOPEZ that  
22 CERVANTES would follow written orders from Castellanos and  
23 defendant L. LAREDO, but not orders relayed by defendant M.  
24 LAREDO.

25          69. On May 19, 2010, defendant LOPEZ, speaking in coded  
26 language over the telephone, informed defendant CERVANTES that  
27 LOPEZ had told defendant M. LAREDO not to interfere with his  
28 efforts to lead the F13 Gang.

1        70. On May 19, 2010, defendant LOPEZ, speaking in coded  
2 language over the telephone, told defendant CERVANTES that LOPEZ  
3 had received inmate correspondence from defendant L. LAREDO that  
4 same day.

5        71. On May 21, 2010, defendant MAESTAS, speaking in coded  
6 language over the telephone, advised defendant LOPEZ that  
7 MAESTAS would tell the family of an unindicted co-conspirator  
8 who owed extortionate taxes and was in hiding that F13 Gang  
9 members in jail would assault the unindicted co-conspirator's  
10 incarcerated brother if the required extortionate taxes were not  
11 paid.

12       72. On May 21, 2010, defendant LOPEZ, speaking in coded  
13 language over the telephone, informed defendant MAESTAS that a  
14 delivery of methamphetamine they had received was of poor  
15 quality.

16       73. On May 21, 2010, defendant MAESTAS, speaking in coded  
17 language over the telephone, described to defendant LOPEZ a  
18 method by which MAESTAS normally tested drugs supplied to him.

19       74. On May 21, 2010, defendants LOPEZ and MAESTAS,  
20 speaking in coded language over the telephone, agreed to supply  
21 one ounce of methamphetamine each to three unindicted co-  
22 conspirators.

23       75. On May 21, 2010, defendant MAESTAS, speaking in coded  
24 language over the telephone, told defendant LOPEZ that MAESTAS  
25 would bring three unindicted co-conspirators as backup the  
26 following day when MAESTAS went to collect extortionate taxes.

1        76. On May 22, 2010, defendant MARTINEZ, speaking in coded  
2 language over the telephone, alerted defendant LOPEZ that  
3 defendants BECERRA and BARRAZA were not following instructions.

4        77. On May 23, 2010, defendant LOPEZ, speaking in coded  
5 language over the telephone, told an unindicted co-conspirator  
6 that LOPEZ has been working with the Mexican Mafia for the last  
7 15 years.

8        78. On June 18, 2010, an unindicted co-conspirator who was  
9 incarcerated at Pelican Bay State Prison, using coded language  
10 in correspondence, advised defendant LOPEZ of defendant L.  
11 LAREDO's efforts to obtain extortionate taxes.

12       79. On July 3, 2010, defendant MARTINEZ, speaking in coded  
13 language over the telephone, informed defendant LOPEZ, who was  
14 incarcerated, that MARTINEZ had collected approximately \$10,000  
15 in extortionate taxes in order to raise bail money for LOPEZ,  
16 with defendant ESPINOZA giving MARTINEZ the largest sum.

17       80. On July 3, 2010, defendants LOPEZ and MARTINEZ,  
18 speaking in coded language during a telephone conversation,  
19 discussed how letters had been sent from Pelican Bay State  
20 Prison informing the recipients that defendant L. LAREDO had  
21 lost inmate privileges and therefore could not receive mail at  
22 this time.

23       81. On July 3, 2010, defendant LOPEZ, speaking in coded  
24 language over the telephone, told defendant MARTINEZ that gang  
25 members were approaching LOPEZ while he was incarcerated and  
26 paying their respects.

27       82. On July 3, 2010, an unindicted co-conspirator,  
28 speaking in coded language over the telephone, told defendant

1 LOPEZ that defendant L. LAREDO was not being allowed to receive  
2 mail at Pelican Bay State Prison.

3 83. On July 3, 2010, defendant LOPEZ, speaking in coded  
4 language over the telephone, explained to an unindicted co-  
5 conspirator that LOPEZ had previously received a letter from  
6 Pelican Bay State Prison saying Castellanos was not allowed to  
7 receive correspondence.

8 84. On July 3, 2010, an unindicted co-conspirator,  
9 speaking in coded language over the telephone, told defendant  
10 LOPEZ that defendant L. LAREDO had instructed the unindicted co-  
11 conspirator to send \$300 to defendant BECERRA and to deposit  
12 money into L. LAREDO's inmate account in Pelican Bay State  
13 Prison.

14 85. On July 5, 2010, defendant CERVANTES, speaking in  
15 coded language over the telephone, informed defendant LOPEZ that  
16 CERVANTES had lost a letter sent by an inmate.

17 86. On July 5, 2010, defendant LOPEZ, speaking in coded  
18 language over the telephone, told defendant CERVANTES that there  
19 would have been serious consequences if CERVANTES had lost an  
20 inmate letter sent by defendant L. LAREDO or any influential  
21 individuals associated with the Mexican Mafia.

22 87. On July 9, 2010, defendant BECERRA, speaking in coded  
23 language over the telephone, told defendant LOPEZ that BECERRA  
24 had collected \$1,000 in extortionate taxes from two individuals  
25 and gave the money to defendant CASADO.

26 88. On July 9, 2010, defendant LOPEZ, speaking in coded  
27 language over the telephone, directed defendant BECERRA to ask  
28

1 defendant ESPINOZA to whom extortionate taxes collected by  
2 ESPINOZA were being given.

3 89. On July 9, 2010, defendant ESPINOZA, speaking in coded  
4 language over the telephone, confirmed to defendant LOPEZ that  
5 all of the extortionate taxes ESPINOZA collected that day would  
6 be delivered to defendant CASADO.

7 90. On July 9, 2010, defendant LOPEZ, speaking in coded  
8 language over the telephone, informed defendant ESPINOZA that  
9 defendant CASADO knew how to record collections of extortionate  
10 taxes and what to do with these illicit proceeds after they were  
11 collected.

12 91. On July 9, 2010, defendant MARTINEZ, speaking in coded  
13 language over the telephone, informed defendant LOPEZ that  
14 MARTINEZ received money from defendant SIFUENTES that SIFUENTES  
15 owed to LOPEZ and that MARTINEZ was going to deliver the money  
16 to defendant CASADO.

17 92. On July 9, 2010, defendant MARTINEZ, speaking in coded  
18 language over the telephone, reported to defendant LOPEZ that  
19 MARTINEZ was going to give defendant CASADO approximately \$1,500  
20 in extortionate taxes.

21 93. On July 9, 2010, defendant MARTINEZ, speaking in coded  
22 language over the telephone, told defendant LOPEZ that MARTINEZ  
23 was going to provide all of the extortionate taxes MARTINEZ  
24 collected to defendant CASADO.

25 94. On August 28, 2010, defendant CAZERES, speaking in  
26 coded language over the telephone, told defendant CERVANTES that  
27 defendant SANCHEZ was not doing what he was supposed to be doing  
28 at a "casita" and was not listening to defendant GRANADOS.



1        95. On August 30, 2010, defendant MARTINEZ, speaking in  
2 coded language during a telephone conversation with defendant  
3 CERVANTES, explained that MARTINEZ had given \$1,300 in  
4 extortionate taxes to defendant BECERRA and \$200 of such  
5 proceeds to defendant M. LAREDO.

6        96. On August 30, 2010, defendant MARTINEZ, speaking in  
7 coded language over the telephone, told defendant CERVANTES that  
8 defendant L. LAREDO had sent a letter ordering MARTINEZ to keep  
9 an eye on an unindicted co-conspirator.

10       97. On August 30, 2010, defendant MARTINEZ, speaking in  
11 coded language over the telephone, advised defendant CERVANTES  
12 that defendant M. LAREDO was sending letters to L. LAREDO at  
13 Pelican Bay State Prison apprising L. LAREDO of the current  
14 status of the F13 Gang.

15       98. On August 30, 2010, defendant CASADO, speaking in  
16 coded language over the telephone, told defendant CERVANTES that  
17 CASADO had not continued to write letters to defendant L. LAREDO  
18 concerning the affairs of the F13 Gang since defendant LOPEZ had  
19 been arrested.

20       99. On August 30, 2010, defendant CASADO, speaking in  
21 coded language over the telephone, told defendant CERVANTES that  
22 defendant M. LAREDO did not want CERVANTES or defendant LOPEZ to  
23 be in charge of the F13 Gang.

24       100. On August 30, 2010, defendant CASADO, speaking in  
25 coded language during a telephone conversation with defendant  
26 CERVANTES, explained that defendant ULLOA had a means of  
27 allowing them to communicate inexpensively with defendant LOPEZ.  
28

1        101. On September 1, 2010, defendant CERVANTES, speaking in  
2 coded language over the telephone, told an unindicted co-  
3 conspirator that CERVANTES had previously written a letter to  
4 Castellanos discussing CERVANTES's leadership of the F13 Gang  
5 out on the streets.

6        102. On September 2, 2010, defendant M. LAREDO, speaking in  
7 coded language over the telephone, told defendant CERVANTES that  
8 she had received a letter from defendant L. LAREDO and asked if  
9 CERVANTES wanted to see it.

10       103. On September 2, 2010, defendant CERVANTES, speaking in  
11 coded language during a telephone conversation with defendant M.  
12 LAREDO, agreed to go to M. LAREDO's residence to read a letter  
13 from defendant L. LAREDO.

14       104. On September 4, 2011, defendant TAVIRA entered Pelican  
15 Bay State Prison, in Crescent City, California, for the purpose  
16 of meeting with defendant L. LAREDO to discuss the business of  
17 the F13 Gang criminal enterprise.

18       105. On September 6, 2010, defendant CERVANTES, speaking in  
19 coded language over the telephone, instructed defendant CAZERES  
20 to bring CERVANTES \$1,000 in extortionate taxes.

21       106. On September 16, 2010, defendant MARTINEZ, speaking in  
22 coded language over the telephone, reported to defendant  
23 CERVANTES that defendant M. LAREDO had called to tell MARTINEZ  
24 that she had received a letter from Pelican Bay State Prison.

25       107. On September 16, 2010, defendant MARTINEZ, speaking in  
26 coded language during a telephone conversation with defendant  
27 CERVANTES, explained that defendant M. LAREDO wanted CERVANTES  
28

1 to go to her residence to review a letter from Pelican Bay State  
2 Prison and that M. LAREDO had asked MARTINEZ to call CERVANTES.

3 108. On September 16, 2010, defendant CERVANTES, speaking  
4 in coded language during a telephone conversation with defendant  
5 MARTINEZ, agreed to go to defendant M. LAREDO's residence to  
6 review a letter she had received from Pelican Bay State Prison.

7 109. On September 23, 2010, defendant MARTINEZ, speaking in  
8 coded language during a telephone conversation with defendant  
9 CERVANTES, explained that MARTINEZ had given money to defendant  
10 M. LAREDO because M. LAREDO was sending defendant TAVIRA to  
11 visit defendant L. LAREDO the following day.

12 110. On September 24, 2010, defendant CERVANTES, speaking  
13 in coded language over the telephone, told an unindicted co-  
14 conspirator that after defendant TAVIRA completed her visit to  
15 defendant L. LAREDO at Pelican Bay State Prison, defendant M.  
16 LAREDO would relay the message from L. LAREDO back to members  
17 and associates of the F13 Gang.

18 111. On September 25, 2010, defendant TAVIRA entered  
19 Pelican Bay State Prison, in Crescent City, California, for the  
20 purpose of meeting with defendant L. LAREDO to discuss the  
21 business of the F13 Gang criminal enterprise.

22 112. On September 25, 2010, defendant TAVIRA, speaking in  
23 coded language during an inmate visit with defendant L. LAREDO,  
24 relayed a message from defendant M. LAREDO regarding defendant  
25 CERVANTES's actions as a shot caller for the F13 Gang.

26 113. On September 25, 2010, defendant L. LAREDO, speaking  
27 in coded language, advised defendant TAVIRA that, based on a  
28

1 message she had relayed from defendant M. LAREDO, L. LAREDO was  
2 going to write a letter reprimanding defendant CERVANTES.

3 114. On September 25, 2010, defendant TAVIRA, speaking in  
4 coded language during an inmate visit with defendant L. LAREDO,  
5 confirmed that L. LAREDO knew that defendant LOPEZ had been  
6 deported to El Salvador.

7 115. On September 25, 2010, defendant TAVIRA, speaking in  
8 coded language during an inmate visit with defendant L. LAREDO,  
9 relayed a message from defendant M. LAREDO inquiring whether L.  
10 LAREDO knew the individual who was taking defendant LOPEZ's  
11 place in the F13 Gang upon his deportation.

12 116. On September 25, 2010, defendant L. LAREDO, speaking  
13 in coded language, told defendant TAVIRA that he was aware  
14 defendant CERVANTES had not been following L. LAREDO's  
15 instructions.

16 117. On September 25, 2010, defendant L. LAREDO, speaking  
17 in coded language, instructed defendant TAVIRA to relay a  
18 message to defendant M. LAREDO regarding the leadership of the  
19 F13 Gang.

20 118. On September 25, 2010, defendant L. LAREDO, speaking  
21 in coded language, ordered defendant TAVIRA to relay individual  
22 messages to defendants CERVANTES, LOPEZ, and MARTINEZ.

23 119. On September 30, 2010, defendant L. LAREDO, using  
24 coded language in correspondence to defendant CERVANTES,  
25 identified himself as the Mexican Mafia member running the F13  
26 Gang.

27 120. On October 10, 2010, defendant L. LAREDO, using coded  
28 language in correspondence, advised defendant CERVANTES of what

1 CERVANTES needed to do to remain in a leadership position in the  
2 F13 Gang.

3 121. On October 10, 2010, defendant L. LAREDO, using coded  
4 language in correspondence, instructed defendant CERVANTES to  
5 follow orders and obey L. LAREDO.

6 122. On October 15, 2010, defendant CERVANTES, speaking in  
7 coded language over the telephone, informed defendant LOPEZ that  
8 defendant L. LAREDO had obtained approval for defendants CASADO  
9 and TAVIRA to visit L. LAREDO at Pelican Bay State Prison.

10 123. On October 15, 2010, defendants CERVANTES and LOPEZ,  
11 speaking in coded language during a telephone conversation,  
12 discussed who would be running the F13 Gang's "casitas" in the  
13 future.

14 124. On October 15, 2010, defendant LOPEZ, speaking in  
15 coded language over the telephone, advised defendant CERVANTES  
16 that they would not be replaced as shot callers for the F13 Gang  
17 because they had the support of Castellanos.

18 125. On October 15, 2010, defendant LOPEZ, speaking in  
19 coded language over the telephone, explained to defendant  
20 CERVANTES that an unindicted co-conspirator was being brought in  
21 as another F13 Gang shot caller because defendant M. LAREDO was  
22 trying to have CERVANTES and LOPEZ replaced.

23 126. On October 15, 2010, defendant GRANADOS, speaking in  
24 coded language during a telephone conversation with defendant  
25 LOPEZ, confirmed that GRANADOS knew that a power struggle was  
26 going on within the F13 Gang and that GRANADOS would support  
27 LOPEZ and defendant CERVANTES.

1       127. On October 16, 2010, defendant LOPEZ, speaking in  
2 coded language over the telephone, informed defendant CERVANTES  
3 that defendant M. LAREDO had collected extortionate taxes from  
4 an unindicted co-conspirator.

5       128. On October 16, 2010, defendant LOPEZ, speaking in  
6 coded language over the telephone, told defendant CERVANTES to  
7 write a letter to Castellanos to explain what was happening and  
8 that Castellanos would keep members and associates of the F13  
9 Gang in line.

10       129. On October 16, 2010, defendant CERVANTES, speaking in  
11 coded language during a telephone conversation with defendant  
12 LOPEZ, explained that CERVANTES was collecting extortionate  
13 taxes, but had not collected very much money.

14       130. On October 16, 2010, defendant GRANADOS, speaking in  
15 coded language over the telephone, explained to defendant  
16 CERVANTES that defendant CAZERES had told GRANADOS that an  
17 unindicted co-conspirator had gone to a "casita" that CAZERES  
18 was running for CERVANTES and that the unindicted co-conspirator  
19 claimed to be taking over control of the illegal gambling  
20 establishment.

21       131. On October 16, 2010, defendant CERVANTES, speaking in  
22 coded language over the telephone, told defendant GRANADOS that  
23 defendant L. LAREDO had sent a message resolving an issue  
24 relating to gang politics involving defendants MARTINEZ and M.  
25 LAREDO.

26       132. On October 17, 2010, defendant AVILA, speaking in  
27 coded language over the telephone, told defendant CERVANTES that  
28 AVILA had gone to a "casita" to check on an issue with a

1 gambling machine and that, while there, AVILA spoke to an  
2 unindicted co-conspirator who claimed to be taking over control  
3 of the F13 Gang's "casitas."

4 133. On October 17, 2010, defendant MARTINEZ, speaking in  
5 coded language during a telephone conversation with defendant  
6 CERVANTES, explained that defendants M. LAREDO and ESPINOZA were  
7 going to an unindicted co-conspirator's residence to discuss a  
8 dispute regarding extortionate taxes.

9 134. On October 17, 2010, defendant MARTINEZ, speaking in  
10 coded language over the telephone, informed defendant CERVANTES  
11 that an F13 Gang member from the Malditos clique owed MARTINEZ  
12 nearly \$29,000.

13 135. On October 19, 2010, defendant GRANADOS, speaking in  
14 coded language over the telephone, reported to defendant  
15 CERVANTES that a gambling machine was not working properly and  
16 that defendant MAESTAS was going to fix it.

17 136. On October 20, 2010, defendant AVILA, speaking in  
18 coded language over the telephone, informed told defendant  
19 CERVANTES that AVILA had tested a gambling machine at one of the  
20 "casitas."

21 137. On October 23, 2010, defendant CASADO entered Pelican  
22 Bay State Prison, in Crescent City, California, for the purpose  
23 of meeting with defendant L. LAREDO to discuss the business of  
24 the F13 Gang criminal enterprise.

25 138. On October 23, 2010, defendant L. LAREDO, speaking in  
26 coded language, told defendant CASADO that defendant CERVANTES  
27 needed to understand that CERVANTES had to follow orders.  
28

1           139. On October 23, 2010, defendant CASADO, speaking in  
2 coded language, informed defendant L. LAREDO that defendant  
3 CERVANTES had paid for her trip up to Pelican Bay State Prison.

4           140. On October 23, 2010, defendant L. LAREDO, speaking in  
5 coded language, explained to defendant CASADO that defendants  
6 CERVANTES and LOPEZ had to obey L. LAREDO's orders.

7           141. On October 23, 2010, defendant L. LAREDO, speaking in  
8 coded language, reminded defendant CASADO that she worked for  
9 him.

10          142. On October 24, 2010, defendant CASADO entered Pelican  
11 Bay State Prison, in Crescent City, California, for the purpose  
12 of meeting with defendant L. LAREDO to discuss the business of  
13 the F13 Gang criminal enterprise.

14          143. On October 24, 2010, defendant L. LAREDO, speaking in  
15 coded language, instructed defendant CASADO to tell defendant  
16 CERVANTES to listen to an unindicted co-conspirator who had been  
17 promoted to be a shot caller of the F13 Gang.

18          144. On October 24, 2010, defendant L. LAREDO, speaking in  
19 coded language, directed defendant CASADO to tell defendant  
20 CERVANTES and an unindicted co-conspirator to pay for CASADO to  
21 return to Pelican Bay State Prison for another visit.

22          145. On October 24, 2010, defendants CERVANTES and LOPEZ,  
23 speaking in coded language during a telephone conversation,  
24 discussed that defendant L. LAREDO had accused them of taking  
25 money collected from extortionate taxes that belonged to L.  
26 LAREDO.

27          146. On October 24, 2010, defendant LOPEZ, speaking in  
28 coded language over the telephone, explained to defendant



1 CERVANTES that defendant L. LAREDO appeared to believe that  
2 every dollar of extortionate taxes collected by the F13 Gang  
3 belonged to L. LAREDO.

4 147. On October 24, 2010, defendants CERVANTES and LOPEZ,  
5 speaking in coded language during a telephone conversation,  
6 discussed an upcoming visit to defendant L. LAREDO at Pelican  
7 Bay State Prison by defendant CASADO.

8 148. On October 24, 2010, defendant LOPEZ, speaking in  
9 coded language over the telephone, explained to defendant  
10 CERVANTES that defendant L. LAREDO wanted all members and  
11 associates of the F13 Gang to obey him.

12 149. On October 24, 2010, defendant LOPEZ, speaking in  
13 coded language over the telephone, asked defendant CERVANTES  
14 whether defendant CASADO had relayed to CERVANTES what defendant  
15 L. LAREDO had said during CASADO's visit at Pelican Bay State  
16 Prison.

17 150. On October 24, 2010, defendant CERVANTES, speaking in  
18 coded language over the telephone, told defendant LOPEZ that a  
19 recent inmate letter from defendant L. LAREDO had instructed  
20 CERVANTES to help LOPEZ, but did not say how to do so.

21 151. On October 24, 2010, defendant LOPEZ, speaking in  
22 coded language over the telephone, told defendant CERVANTES that  
23 defendant L. LAREDO wanted them to obey L. LAREDO in every way  
24 without question.

25 152. On October 27, 2010, defendant CERVANTES, speaking in  
26 coded language over the telephone, explained to defendant  
27 GRANADOS that defendant CAZERES had to provide more money from  
28 the "casita" that CAZERES was running for the F13 Gang.

1        153. On October 31, 2010, defendant GRANADOS, speaking in  
2 coded language over the telephone, instructed defendant MENDEZ  
3 to go to the F13 Gang's "casita" on West 65<sup>th</sup> Street, in Los  
4 Angeles, California.

5        154. On November 1, 2010, defendants CERVANTES, GRANADOS,  
6 CAZERES, and SANCHEZ, and others known and unknown to the Grand  
7 Jury, possessed eight illegal gambling machines, 11 small  
8 baggies containing methamphetamine, and a loaded Smith & Wesson  
9 .38 caliber revolver at a "casita" located at a residence on  
10 West 70th Street, in Los Angeles, California.

11       155. On November 1, 2010, defendant CAZERES, speaking in  
12 coded language over the telephone, reported to defendant  
13 GRANADOS that law enforcement had entered the F13 Gang's  
14 "casita" located at a residence on West 70th Street, in Los  
15 Angeles, California.

16       156. On November 1, 2010, defendant GRANADOS, speaking in  
17 coded language over the telephone, informed defendant CAZERES  
18 that GRANADOS had just gone by the "casita" on West 70th Street,  
19 in Los Angeles, California, and observed law enforcement at the  
20 location.

21       157. On November 1, 2010, defendant CAZERES, speaking in  
22 coded language over the telephone, informed defendant GRANADOS  
23 that defendant SANCHEZ had been at the "casita" on West 70th  
24 Street, in Los Angeles, California.

25       158. On November 2, 2010, an unindicted co-conspirator,  
26 speaking in coded language over the telephone, informed  
27 defendant GRANADOS that the unindicted co-conspirator was with  
28 defendant CAZERES at the F13 Gang's other "casita" located at a

1 residence on 59<sup>th</sup> Street, in Los Angeles, California, and that,  
2 while they wanted to open the "casita" that night, "everything  
3 went to hell" and there were no gambling machines at the  
4 "casita."

5 159. On November 9, 2010, defendants MARTINEZ and M.  
6 LAREDO, speaking in coded language during a telephone  
7 conversation, discussed setting up a meeting with defendants  
8 CERVANTES and LOPEZ and an unindicted co-conspirator because the  
9 unindicted co-conspirator had received a letter from Pelican Bay  
10 State Prison.

11 160. On November 9, 2010, defendant MARTINEZ, speaking in  
12 coded language over the telephone, informed defendant M. LAREDO  
13 that MARTINEZ had learned of a location in the territory  
14 controlled by the F13 Gang from which drugs were being sold and  
15 that defendant ESPINOZA was going to collect extortionate taxes  
16 from the location.

17 161. On November 12, 2010, defendant M. LAREDO, speaking in  
18 coded language over the telephone, informed defendant MARTINEZ  
19 that defendant L. LAREDO had instructed them to send defendant  
20 TAVIRA to visit L. LAREDO at Pelican Bay State Prison.

21 162. On November 17, 2010, an unindicted co-conspirator,  
22 speaking in coded language over the telephone, told defendant  
23 MARTINEZ that defendant M. LAREDO was essentially in control of  
24 the F13 Gang out on the streets.

25 163. On November 17, 2010, defendant MARTINEZ, speaking in  
26 coded language over the telephone, advised an unindicted co-  
27 conspirator that the F13 Gang had found someone who would take  
28

1 the blame for the drugs found at defendant M. LAREDO's  
2 residence.

3 164. On November 17, 2010, defendant MARTINEZ, speaking in  
4 coded language over the telephone, informed an unindicted co-  
5 conspirator that defendant M. LAREDO had claimed to be in charge  
6 of the F13 Gang out on the streets.

7 165. On November 17, 2010, defendants CERVANTES and  
8 MANDUJANO, speaking in coded language during a telephone  
9 conversation, discussed the circumstance surrounding the arrest  
10 of defendant MENDEZ.

11 166. On November 19, 2010, defendants CERVANTES, GRANADOS,  
12 and CAZERES, and others known and unknown to the Grand Jury,  
13 possessed nine illegal gambling machines, "pay and owe" sheets,  
14 and approximately 2.0 grams of a mixture and substance  
15 containing a detectable amount of cocaine and 10.4 grams of  
16 methamphetamine packaged for distribution at a "casita" located  
17 at a residence on West 65th Street, in Los Angeles, California.

18 167. On November 19, 2010, defendants CERVANTES, GRANADOS,  
19 CAZERES, and SANCHEZ, and others known and unknown to the Grand  
20 Jury, possessed six illegal gambling machines at a "casita"  
21 located at a residence on West 59th Place, in Los Angeles,  
22 California.

23 168. On November 23, 2010, defendants CERVANTES and  
24 GRANADOS possessed two illegal gambling machines, approximately  
25 5.6 grams of methamphetamine contained in 33 plastic baggies,  
26 and approximately 19.9 grams of a mixture and substance  
27 containing a detectable amount of cocaine at a "casita" on  
28

1 Duarte Avenue, in Los Angeles, California, within the territory  
2 controlled by the F13 Gang.

3 169. On November 23, 2010, defendant CERVANTES possessed  
4 two illegal gambling machines, a large bundle of marijuana  
5 (gross weight of approximately 3,239 grams), packaging  
6 materials, a large digital scale, and written correspondence  
7 from defendant L. LAREDO at CERVANTES's residence on Duarte  
8 Avenue, in Los Angeles, California, within the territory  
9 controlled by the F13 Gang.

10 170. On November 23, 2010, defendant ESPINOZA, speaking in  
11 coded language over the telephone, told defendant MARTINEZ that  
12 ESPINOZA had apprised defendant M. LAREDO of recent law  
13 enforcement activities.

14 171. On November 26, 2010, defendant TAVIRA entered Pelican  
15 Bay State Prison, in Crescent City, California, for the purpose  
16 of meeting with defendant L. LAREDO to discuss the business of  
17 the F13 Gang criminal enterprise.

18 172. On November 27, 2010, defendant TAVIRA entered Pelican  
19 Bay State Prison, in Crescent City, California, for the purpose  
20 of meeting with defendant L. LAREDO to discuss the business of  
21 the F13 Gang criminal enterprise.

22 173. On November 27, 2010, defendants CERVANTES and  
23 CAZERES, speaking in coded language during a telephone  
24 conversation, discussed a gambling machine at one of the  
25 "casitas" run by the F13 Gang.

26 174. On November 28, 2010, defendant TAVIRA entered Pelican  
27 Bay State Prison, in Crescent City, California, for the purpose  
28

1 of meeting with defendant L. LAREDO to discuss the business of  
2 the F13 Gang criminal enterprise.

3 175. On July 6, 2011, defendant JUAREZ, speaking in coded  
4 language, advised another confidential informant ("CI-2") that  
5 JUAREZ had previously collected extortionate taxes for the F13  
6 Gang.

7 176. On July 6, 2011, defendant JUAREZ, speaking in coded  
8 language, recounted to CI-2 that multiple associates of the F13  
9 Gang, including defendant LOPEZ, had been with JUAREZ just prior  
10 to a recent arrest, but JUAREZ had told the individuals to leave  
11 the location to avoid apprehension by law enforcement.

12 177. On July 6, 2011, defendant JUAREZ, speaking in coded  
13 language, told CI-2 that the F13 Gang had tried to put a "green  
14 light" on JUAREZ when he was young because JUAREZ had killed two  
15 other members of the gang.

16 178. On July 6, 2011, defendant JUAREZ, speaking in coded  
17 language, told CI-2 that JUAREZ had a job working with a gang  
18 intervention group, but that the job did not prevent JUAREZ from  
19 conducting his criminal activities.

20 179. On July 6, 2011, defendant JUAREZ, speaking in coded  
21 language, told CI-2 that defendant L. LAREDO was in charge of  
22 the F13 Gang's activities on the streets and was a member of the  
23 Mexican Mafia.

24 180. On September 3, 2011, defendant TAVIRA entered Pelican  
25 Bay State Prison, in Crescent City, California, for the purpose  
26 of meeting with Castellanos to discuss the business of the F13  
27 Gang criminal enterprise.

1 181. On September 3, 2011, Castellanos and defendant  
2 TAVIRA, using coded language during an inmate visit at Pelican  
3 Bay State Prison, discussed a "green light" order that  
4 Castellanos wished TAVIRA to relay to F13 Gang members and  
5 associates on the streets.

6 182. On September 4, 2011, defendant TAVIRA entered Pelican  
7 Bay State Prison, in Crescent City, California, for the purpose  
8 of meeting with defendant L. LAREDO to discuss the business of  
9 the F13 Gang criminal enterprise.

10 183. On September 18, 2011, defendants CASADO and TAVIRA  
11 entered Pelican Bay State Prison, in Crescent City, California,  
12 for the purpose of meeting with defendant L. LAREDO to discuss  
13 the business of the F13 Gang criminal enterprise.

14 The March 2010 Killing of Victim R.A.

15 184. On March 13, 2010, defendant DORADO, speaking in coded  
16 language over the telephone, reported to defendant ULLOA that  
17 victim R.A. had told other F13 Gang members that ULLOA was  
18 cooperating with law enforcement.

19 185. On March 13, 2010, defendant ULLOA, speaking in coded  
20 language over the telephone, directed defendant DORADO to have  
21 victim R.A. violently disciplined.

22 186. On March 13, 2010, defendant DORADO, speaking in coded  
23 language during a telephone conversation with defendant ULLOA,  
24 agreed to have F13 Gang members violently discipline victim R.A.

25 187. On March 13, 2010, defendant FAZAH, speaking in coded  
26 language over the telephone, confirmed to defendant ULLOA that  
27 victim R.A. had been talking "some stupid shit" about ULLOA to  
28 other F13 Gang members.

1        188. On March 13, 2010, defendant ULLOA, speaking in coded  
2 language over the telephone, ordered defendant FAZAH to  
3 violently discipline victim R.A.

4        189. On March 13, 2010, defendant FAZAH, speaking in coded  
5 language during a telephone conversation with defendant ULLOA,  
6 agreed that FAZAH would use violence to discipline victim R.A.

7        190. On March 13, 2010, defendant DORADO, speaking in coded  
8 language over the telephone, assured defendant ULLOA that  
9 defendant FAZAH could be trusted to discipline victim R.A.

10       191. On March 13, 2010, defendant ULLOA, speaking in coded  
11 language over the telephone, threatened victim R.A. with violent  
12 retribution for telling other F13 Gang members that ULLOA had  
13 cooperated with law enforcement.

14       192. On March 13, 2010, having listened to a conversation  
15 between defendant ULLOA and victim R.A., defendant ARANA advised  
16 ULLOA that "that fool [victim R.A.] was scared" when ULLOA  
17 threatened R.A. with violence.

18       193. On March 13, 2010, defendant ULLOA, speaking in coded  
19 language over the telephone, alerted defendant LOPEZ that victim  
20 R.A. had accused ULLOA of cooperating with law enforcement and  
21 that ULLOA had himself told R.A. that R.A. would be disciplined.

22       194. On March 13, 2010, defendant LOPEZ, speaking in coded  
23 language over the telephone, told defendant ULLOA that LOPEZ  
24 would have other F13 Gang members look for victim R.A. so that  
25 LOPEZ could discipline him.

26       195. On March 13, 2010, defendant DORADO, speaking in coded  
27 language over the telephone, told defendant ULLOA that DORADO  
28



1 and his associates did not need any help from defendant LOPEZ to  
2 find and discipline victim R.A.

3 196. On March 14, 2010, defendant Josue Rojas, aka "Chino,"  
4 and other F13 Gang members assaulted victim R.A. in an alley  
5 between Stafford Street and Templeton Street, in Huntington  
6 Park, California, within the territory controlled by the F13  
7 Gang.

8 197. On March 14, 2010, victim R.A. was killed by a single  
9 gunshot to the head in an alley between Stafford Street and  
10 Templeton Street, in Huntington Park, California, within the  
11 territory controlled by the F13 Gang.

12 198. On March 14, 2010, defendant ARANA, speaking in coded  
13 language over the telephone, told defendant ULLOA that defendant  
14 DORADO had asked ARANA to check the streets around her residence  
15 for the presence of law enforcement and wanted to hide out at  
16 ARANA's residence.

17 199. On March 14, 2010, defendant DORADO, speaking in coded  
18 language over the telephone, reported to defendant ULLOA that  
19 victim R.A. had been killed and that DORADO could not go to his  
20 own residence for fear of being apprehended by law enforcement.

21 200. On March 18, 2010, defendant CERVANTES, speaking in  
22 coded language over the telephone, asked defendant ULLOA who  
23 gave the order for victim R.A. to be killed.

24 201. On March 18, 2010, defendant ULLOA, speaking in coded  
25 language over the telephone, told defendants CERVANTES and LOPEZ  
26 that ULLOA had ordered victim R.A. to be assaulted, but not to  
27 be killed.

1        202. On March 18, 2010, defendant ULLOA, speaking in coded  
2 language over the telephone, informed defendant CERVANTES that  
3 defendant GALVEZ was present when victim R.A. was killed and  
4 knew what happened.

5        203. On March 20, 2010, defendant LOPEZ, speaking in coded  
6 language over the telephone, reminded defendant ULLOA that only  
7 defendant L. LAREDO and Castellanos have the authority to order  
8 the killing of F13 Gang members.

9        Drug Trafficking and Unlawful Possession of Firearms

10       204. On October 7, 2009, defendant SIFUENTES sold  
11 approximately 11.3 grams of methamphetamine, in the parking lot  
12 of a restaurant on Eastern Avenue, in Bell Gardens, California.

13       205. On October 8, 2009, defendant SIFUENTES sold a Smith &  
14 Wesson 9mm pistol, with a loaded, 15-round ammunition magazine,  
15 in the parking lot of a restaurant on Florence Avenue, in  
16 Huntington Park, California, within the territory controlled by  
17 the F13 Gang.

18       206. On January 12, 2010, defendant David Proo, aka "D"  
19 ("Proo"), speaking in coded language over the telephone, asked  
20 defendant SIFUENTES to deliver a quantity of drugs to a  
21 restaurant where Proo worked, on Florence Avenue, in Huntington  
22 Park, California, within the territory controlled by the F13  
23 Gang.

24       207. On January 15, 2010, defendant SIFUENTES sold a Sten-  
25 type 9mm caliber machinegun and approximately 29 rounds of 9mm  
26 ammunition in the parking lot of a restaurant on Florence  
27 Avenue, in Huntington Park, California, within the territory  
28 controlled by the F13 Gang.

1        208. On January 16, 2010, defendant Proo, speaking in coded  
2 language over the telephone, inquired as to the price of a  
3 quantity of methamphetamine.

4        209. On January 16, 2010, defendant SIFUENTES, speaking in  
5 coded language over the telephone, told defendant Proo that  
6 SIFUENTES possessed the quantity of drugs requested by Proo and  
7 would bring the drugs to Proo in 10-15 minutes.

8        210. On February 26, 2010, defendant ULLOA, speaking in  
9 coded language over the telephone, told defendant ARANA that  
10 ARANA should sell the methamphetamine they possessed, after  
11 which defendant MAESTAS would supply additional drugs.

12       211. On February 26, 2010, defendant ARANA, speaking in  
13 coded language over the telephone, confirmed with defendant  
14 ULLOA that she could sell their methamphetamine and that she  
15 would steal a scale from her work to weigh the drugs.

16       212. On February 26, 2010, defendant ULLOA, speaking in  
17 coded language over the telephone, reminded defendant ARANA that  
18 a drug user who ARANA previously supplied had said that ULLOA  
19 and ARANA's methamphetamine was "bomb" (high quality).

20       213. On March 2, 2010, defendant Proo, speaking in coded  
21 language over the telephone, informed defendant SIFUENTES that a  
22 prior drug customer wanted to buy methamphetamine from them  
23 again.

24       214. On March 2, 2010, defendant SIFUENTES, speaking in  
25 coded language over the telephone, directed defendant Proo to  
26 tell a drug customer that she was receiving a discount because  
27 Proo was part of the same organization as SIFUENTES.  
28

1           215. On March 2, 2010, defendants SIFUENTES and Proo sold  
2 approximately 2.3 grams of methamphetamine inside the  
3 restaurant where Proo worked, on Florence Avenue, in Huntington  
4 Park, California, within the territory controlled by the F13  
5 Gang.

6           216. On March 4, 2010, defendant ARANA, speaking in coded  
7 language over the telephone, confirmed to defendant ULLOA that  
8 ARANA had previously sold their methamphetamine.

9           217. On March 14, 2010, defendant FAZAH possessed  
10 approximately 16.9 grams of methamphetamine packaged for  
11 distribution, a digital scale, "pay and owe" sheets, over \$1,000  
12 in cash, two police scanner radios, a loaded .22 caliber rifle,  
13 10 rounds of .44 caliber ammunition, a 30-round ammunition  
14 magazine containing 10 hollow-point 9mm caliber bullets, and  
15 paperwork displaying the words "Florescia," "Bear Street," and  
16 "F13," at his residence on Stafford Avenue, in Huntington Park,  
17 California, within the territory controlled by the F13 Gang.

18           218. On March 19, 2010, defendant SIFUENTES possessed  
19 approximately 11.5 grams of methamphetamine, 689.7 grams of  
20 marijuana packaged for distribution, 5.3 grams of a mixture and  
21 substance containing a detectable amount of cocaine, 3.4 grams  
22 of cocaine base in the form of crack cocaine contained in 13  
23 different plastic baggies, 16 individually-packaged tablets of  
24 3,4-methylenedioxy-methamphetamine ("MDMA"), three digital  
25 scales, plastic packaging material, and six rounds of .38  
26 caliber ammunition, at his residence on Stafford Avenue in  
27 Huntington Park, California, within the territory controlled by  
28 the F13 Gang.

1        219. On April 15, 2010, defendant MARTINEZ, speaking in  
2 coded language over the telephone, confirmed to defendant LOPEZ  
3 that a drug deal had been completed and that MARTINEZ was going  
4 to drive down to San Diego to oversee the arrival and  
5 transportation of the drugs.

6        220. On April 18, 2010, defendant BARRAZA, speaking in  
7 coded language over the telephone, informed defendant LOPEZ that  
8 BARRAZA was going to give an unindicted co-conspirator a sample  
9 of drugs.

10       221. On April 18, 2010, defendant BARRAZA, speaking in  
11 coded language over the telephone, told defendant LOPEZ that  
12 BARRAZA gave a drug sample to an unindicted co-conspirator, who  
13 was going to have a third party test it.

14       222. On April 18, 2010, defendant MARTINEZ, speaking in  
15 coded language over the telephone, apprised defendant LOPEZ of  
16 an unindicted co-conspirator who wished to purchase drugs.

17       223. On April 18, 2010, defendant BARRAZA, speaking in  
18 coded language over the telephone, asked defendant LOPEZ what  
19 steps should be taken to complete a drug deal once an unindicted  
20 co-conspirator tested a drug sample and agreed to purchase a  
21 larger quantity of the drug.

22       224. On April 21, 2010, defendants LOPEZ and MARTINEZ,  
23 speaking in coded language during a telephone conversation,  
24 agreed that defendant BARRAZA would go to LOPEZ's residence to  
25 pick up a firearm.

26       225. On May 7, 2010, defendant MARTINEZ, speaking in coded  
27 language over the telephone, told defendant LOPEZ that a  
28

1 customer did not like the drug sample they had provided and  
2 asked LOPEZ to provide another sample.

3 226. On May 10, 2010, defendant LOPEZ, speaking in coded  
4 language over the telephone, advised defendant CERVANTES that  
5 LOPEZ possessed a .45 caliber firearm and asked whether  
6 CERVANTES possessed ammunition for the gun.

7 227. On May 10, 2010, defendant CERVANTES, speaking in  
8 coded language during a telephone conversation with defendant  
9 LOPEZ, agreed to check to see whether he possessed .45 caliber  
10 ammunition that he could provide to LOPEZ.

11 228. On May 11, 2010, defendant MARTINEZ, speaking in coded  
12 language over the telephone, informed defendant LOPEZ of the  
13 price that particular customers were willing to pay for high  
14 quality drugs.

15 229. On May 17, 2010, defendant MARTINEZ, speaking in coded  
16 language over the telephone, informed defendant LOPEZ that drug  
17 customers had arrived and that they wanted to purchase drugs.

18 230. On May 17, 2010, defendant MARTINEZ, speaking in coded  
19 language over the telephone, told defendant LOPEZ about a drug  
20 customer who had discussed purchasing a large amount of drugs.

21 231. On June 15, 2010, defendant BARRAZA, speaking in coded  
22 language over the telephone, advised defendant M. LAREDO that  
23 BARRAZA and defendant MARTINEZ were leaving M. LAREDO's home and  
24 that they had removed the drugs from the premises.

25 232. On June 28, 2010, defendants MARTINEZ, M. LAREDO, and  
26 BARRAZA possessed approximately 12 bundles of marijuana (gross  
27 weight of approximately 108,729 grams), a digital scale, and  
28 plastic packaging materials at M. LAREDO's residence on East 61<sup>st</sup>

1 Street, in Los Angeles, California, within the territory  
2 controlled by the F13 Gang.

3 233. On July 9, 2010, defendant MARTINEZ, speaking in coded  
4 language over the telephone, told defendant LOPEZ that MARTINEZ  
5 possessed drugs to sell.

6 234. On August 30, 2010, defendant MARTINEZ, speaking in  
7 coded language over the telephone, told defendant CERVANTES that  
8 a source of supply had just shown MARTINEZ a sample of high  
9 quality drugs.

10 235. On September 8, 2010, defendants CERVANTES and  
11 MARTINEZ, speaking in coded language during a telephone  
12 conversation, discussed upcoming drug orders.

13 236. On September 12, 2010, defendants CERVANTES and  
14 MANDUJANO, speaking in coded language during a telephone  
15 conversation, discussed making a purchase of methamphetamine  
16 from a source of supply.

17 237. On September 12, 2010, defendant MANDUJANO, speaking  
18 in coded language over the telephone, informed defendant  
19 CERVANTES that MANDUJANO's source of supply possessed drugs in  
20 Riverside and suggested that they go there together to inspect  
21 the drugs.

22 238. On September 14, 2010, defendant MANDUJANO, speaking  
23 in coded language over the telephone, told defendant CERVANTES  
24 that MANDUJANO would check with a source of supply regarding  
25 purchasing methamphetamine.

26 239. On September 25, 2010, defendants CERVANTES and  
27 MANDUJANO, speaking in coded language during a telephone  
28 conversation, discussed prices for drugs.

1       240. On October 8, 2010, defendant CERVANTES, speaking in  
2 coded language over the telephone, told defendant MARTINEZ about  
3 a potential source of supply of marijuana and methamphetamine.

4       241. On November 8, 2010, defendant MARTINEZ, speaking in  
5 coded language over the telephone, told an unindicted co-  
6 conspirator that MARTINEZ wanted to continue selling drugs to a  
7 customer.

8       242. On November 8, 2010, defendant Jesus Meza, aka "Chana"  
9 ("Meza"), speaking in coded language over the telephone, told  
10 defendant CERVANTES that Meza possessed a sample of drugs and  
11 had been waiting for CERVANTES to complete a drug transaction.

12       243. On November 8, 2010, defendant Meza, speaking in coded  
13 language during a telephone conversation with defendant  
14 CERVANTES, explained that Meza had held a sample of drugs for  
15 CERVANTES for three days, but that the drugs were of good  
16 quality.

17       244. On November 8, 2010, defendant Meza, speaking in coded  
18 language over the telephone, informed defendant CERVANTES that  
19 Meza was going to go pick up 100 pounds of marijuana from a  
20 source of supply.

21       245. On November 8, 2010, defendants CERVANTES and Meza  
22 possessed multiple large bundles of marijuana (gross weight of  
23 approximately 49,897 grams), "pay and owe" sheets, and two  
24 digital scales at his residence on Orange Avenue, in Paramount,  
25 California.

26       246. On November 9, 2010, defendant MANDUJANO, speaking in  
27 coded language over the telephone, informed defendant CERVANTES  
28 that defendant BECERRA had taken MANDUJANO's drugs to try to



1 sell them, but that MANDUJANO would be supplied more drugs the  
2 following day.

3 247. On November 11, 2010, defendant MARTINEZ, speaking in  
4 coded language over the telephone, reported to defendant LOPEZ  
5 that customers went to see drugs that defendant BECERRA was  
6 selling for them, but did not purchase anything.

7 248. On November 16, 2010, defendant MENDEZ, speaking in  
8 coded language over the telephone, told defendant CERVANTES that  
9 MENDEZ was waiting to receive a sample of drugs.

10 249. On November 16, 2010, defendants CERVANTES and MENDEZ,  
11 speaking in coded language during a telephone conversation,  
12 discussed whether MENDEZ's source of supply could bring  
13 additional drugs for CERVANTES when making a delivery to MENDEZ.

14 250. On November 16, 2010, defendant MENDEZ and an  
15 unindicted F13 Gang member possessed five large bundles of  
16 marijuana and a bag of marijuana (total gross weight of  
17 approximately 25,134 grams) at MENDEZ's residence on Maie  
18 Avenue, in Los Angeles, California, within the territory  
19 controlled by the F13 Gang.

20 251. On November 17, 2010, defendant MARTINEZ, speaking in  
21 coded language over the telephone, advised an unindicted co-  
22 conspirator that law enforcement had found a stash of MARTINEZ  
23 and defendant BARRAZA's drugs that were being stored in  
24 defendant M. LAREDO's residence.

25 252. On November 18, 2010, defendant BECERRA possessed  
26 marijuana prepared for distribution (gross weight of  
27 approximately 12,940 grams) and a large electronic scale at his  
28

1 residence on Cudahy Street, in Huntington Park, California,  
2 within the territory controlled by the F13 Gang.

3 253. On November 18, 2010, defendant ESPINOZA possessed an  
4 SKS rifle, a 9mm handgun, and ammunition, at his residence on  
5 Flower Street, in Bellflower, California.

6 254. On November 19, 2010, defendant SANCHEZ possessed a  
7 loaded 9mm caliber handgun, additional 9mm caliber ammunition,  
8 and methamphetamine at the F13 Gang's "casita" located at a  
9 residence on West 59<sup>th</sup> Place, in Los Angeles, California.

10 255. On November 20, 2010, defendant MARTINEZ, speaking in  
11 coded language over the telephone, advised an unindicted co-  
12 conspirator that law enforcement had found defendant BECERRA to  
13 be in possession of marijuana.

14 256. On November 22, 2010, defendant AVILA possessed  
15 approximately 14.6 grams of methamphetamine, "pay and owe"  
16 sheets, a digital scale, plastic baggies, a loaded 9mm caliber  
17 pistol, and a loaded .38 caliber revolver at his residence on E.  
18 41<sup>st</sup> Street, in Los Angeles, California.

19 257. On November 24, 2010, defendant Meza, speaking in  
20 coded language over the telephone, accused defendant CERVANTES  
21 of owing Meza \$1,000 from past drug transactions.

22 258. On November 24, 2010, defendant CERVANTES, speaking in  
23 coded language over the telephone, asserted to defendant Meza  
24 that CERVANTES always paid for the drugs he received from Meza.

25 259. On December 2, 2010, defendant MANDUJANO possessed a  
26 loaded .38 caliber revolver, a .40 caliber handgun with two  
27 magazines and nine rounds of ammunition, two digital scales,  
28 plastic packaging material, and \$1,351 in cash, including

1 methamphetamine in his vehicle, at his residence on Wall Street,  
2 in Los Angeles, California.

3 260. On February 25, 2011, defendant MAESTAS sold  
4 approximately 13.7 grams of methamphetamine at a residence on  
5 Whitsett Avenue, in Los Angeles, California, within the  
6 territory controlled by the F13 Gang.

7 261. On March 14, 2011, defendant MAESTAS, speaking in  
8 coded language over the telephone, advised a law enforcement  
9 officer acting in an undercover capacity ("UC") that one ounce  
10 of methamphetamine would cost \$1,000.

11 262. On March 14, 2011, defendant MAESTAS, speaking in  
12 coded language over the telephone, informed the UC that MAESTAS  
13 regularly possessed methamphetamine for sale.

14 263. On March 18, 2011, defendant MAESTAS sold  
15 approximately 27.6 grams of methamphetamine at a residence on  
16 Whitsett Avenue, in Los Angeles, California, within the  
17 territory controlled by the F13 Gang.

18 264. On April 15, 2011, defendants MAESTAS and JUAREZ sold  
19 approximately 27.5 grams of methamphetamine at a residence on  
20 Whitsett Avenue, in Los Angeles, California, within the  
21 territory controlled by the F13 Gang.

22 265. On May 18, 2011, defendant JUAREZ sold an AK-style  
23 rifle loaded with 20 rounds of ammunition at an apartment  
24 complex on Templeton Street, in Huntington Park, California,  
25 within the territory controlled by the F13 Gang.

26 266. On May 18, 2011, defendants MAESTAS and JUAREZ sold  
27 approximately 80 grams of methamphetamine at an apartment  
28

1 complex on Templeton Street, in Huntington Park, California,  
2 within the territory controlled by the F13 Gang.

3 267. On June 27, 2011, defendant SIFUENTES sold  
4 approximately 56 grams of methamphetamine in the parking lot of  
5 a bowling alley on Gage Avenue, in Huntington Park, California.

6 268. On July 6, 2011, defendant JUAREZ and an unindicted  
7 co-conspirator sold three shotguns at a residence on 8<sup>th</sup> Street,  
8 in Buena Park, California.

9 269. On July 6, 2011, defendant JUAREZ, speaking in coded  
10 language, told a CI about a source of supply of methamphetamine.

11 270. On July 6, 2011, defendant JUAREZ sold approximately  
12 109.7 grams of methamphetamine on Miramonte Boulevard, in Los  
13 Angeles, California, within the territory controlled by the F13  
14 gang.

15 271. On July 6, 2011, defendant JUAREZ, speaking in coded  
16 language, asked CI-2 if CI-2 wanted to order an additional  
17 quarter pound of methamphetamine from JUAREZ.

18 272. On July 11, 2011, defendant SIFUENTES sold a Ruger .22  
19 caliber pistol, loaded with four rounds of ammunition, in the  
20 parking lot of a restaurant on Florence Avenue, in Huntington  
21 Park, California, within the territory controlled by the F13  
22 Gang.

23 273. On July 12, 2011, defendant SIFUENTES sold a Glock .40  
24 caliber pistol and three other handguns in the parking lot of a  
25 restaurant on Eastern Avenue, in Bell Gardens, California.

26 274. On August 3, 2011, defendant SIFUENTES sold a Walther  
27 P38 9mm pistol and a Smith & Wesson .22 caliber handgun in the  
28

1 parking lot of a restaurant on Eastern Avenue, in Bell Gardens,  
2 California.

3 275. On August 9, 2011, defendant SIFUENTES sold a loaded  
4 .40 caliber pistol in the parking lot of a restaurant on Eastern  
5 Avenue, in Bell Gardens, California.

6 276. On August 18, 2011, defendant SIFUENTES sold a Smith &  
7 Wesson .38 caliber revolver, with six rounds of ammunition, in  
8 the parking lot of a restaurant on Eastern Avenue, in Bell  
9 Gardens, California.

10 277. On August 30, 2011, defendant SIFUENTES sold a rifle  
11 and 27 rounds of ammunition in the parking lot of a restaurant  
12 on Eastern Avenue, in Bell Gardens, California.

13 278. On September 2, 2011, defendant SIFUENTES sold a  
14 Norinco North China Industries 7.62 caliber rifle, a loaded  
15 ammunition magazine, and 38 rounds of ammunition in the parking  
16 lot of a restaurant on Eastern Avenue, in Bell Gardens,  
17 California.

18 279. On September 8, 2011, defendant SIFUENTES sold a .40  
19 caliber Desert Eagle pistol, two other handguns, and ammunition  
20 in the parking lot of a shopping mall in Cerritos, California.

21 280. On October 11, 2011, defendant SIFUENTES sold two .40  
22 caliber handguns and four ammunition magazines in the parking  
23 lot of a shopping mall in Cerritos, California.

24 281. On October 14, 2011, defendant SIFUENTES sold a  
25 Beretta 9mm rifle and a Mossberg 12-gauge shotgun in the parking  
26 lot of a shopping mall in Cerritos, California.

1        Smuggling of Drugs into the LACJ System

2        282. On February 25, 2010, defendant ULLOA, speaking in  
3        coded language over the telephone, told defendant ARANA that  
4        defendant DORADO would deliver drugs for ULLOA on March 18,  
5        2010.

6        283. On February 26, 2010, defendant ULLOA, speaking in  
7        coded language over the telephone, instructed defendant ARANA to  
8        deliver drugs to an unindicted co-conspirator planning to turn  
9        himself in to the authorities, which was to be separate from the  
10       drugs ULLOA had scheduled to be smuggled into NCCF on March 18,  
11       2010.

12       284. On February 26, 2010, defendant ARANA, speaking in  
13       coded language over the telephone, described for defendant ULLOA  
14       the appearance of drugs that were to be smuggled into NCCF.

15       285. On March 3, 2010, defendant ARANA, speaking in coded  
16       language over the telephone, told defendant ULLOA that she had  
17       retrieved methamphetamine from the garage and had weighed the  
18       methamphetamine.

19       286. On March 4, 2010, defendant ARANA, speaking in coded  
20       language over the telephone, reported to defendant ULLOA that a  
21       drug user had tested their methamphetamine and determined it to  
22       be of high quality.

23       287. On March 4, 2010, defendant ULLOA, speaking in coded  
24       language over the telephone, told defendant LOPEZ that ULLOA had  
25       lined up an individual to turn himself in to the authorities to  
26       smuggle heroin to ULLOA in NCCF.

27       288. On March 4, 2010, defendant ULLOA, speaking in coded  
28       language over the telephone, asked defendant LOPEZ to provide

1 ULLOA with additional heroin to be smuggled into the LACJ  
2 system.

3 289. On March 5, 2010, defendant ULLOA, speaking in coded  
4 language over the telephone, told defendant ARANA that ULLOA  
5 would make \$6,000 or \$7,000 from the drugs that defendant DORADO  
6 would be providing them to smuggle into NCCF.

7 290. On March 5, 2010, defendant ULLOA, speaking in coded  
8 language over the telephone, told an unindicted co-conspirator  
9 that ULLOA and his associates had a shipment of drugs ready to  
10 be smuggled into NCCF on March 18, 2010.

11 291. On March 6, 2010, defendant ULLOA, speaking in coded  
12 language over the telephone, directed defendant ARANA to give  
13 \$1,000 to the person who was going to smuggle drugs into the  
14 LACJ system for ULLOA, after ULLOA received the drugs.

15 292. On March 8, 2010, defendant DORADO, speaking in coded  
16 language over the telephone, informed defendant ULLOA that  
17 defendant AYALA was ready to turn himself in to the authorities  
18 in order to smuggle drugs into the LACJ system for ULLOA and  
19 DORADO.

20 293. On March 9, 2010, defendant ULLOA, speaking in coded  
21 language over the telephone, asked defendant LOPEZ to provide  
22 additional heroin on March 15, 2010 because ULLOA had someone  
23 who was going to smuggle drugs into the LACJ system on March 18,  
24 2010.

25 294. On March 10, 2010, defendant DORADO, speaking in coded  
26 language over the telephone, advised defendant ULLOA that DORADO  
27 would take the drugs from defendant ARANA and have defendant  
28

1 GALVEZ package the drugs for defendant AYALA to smuggle into the  
2 LACJ system.

3 295. On March 10, 2010, defendant DORADO, speaking in coded  
4 language over the telephone, informed defendant ULLOA that  
5 defendant GALVEZ had packaged drugs for them in the past and  
6 would do a good job packaging the drugs being smuggled to ULLOA.

7 296. On March 12, 2010, defendant ULLOA, speaking in coded  
8 language over the telephone, reminded defendant ARANA that she  
9 needed to know exactly how their drugs were being smuggled into  
10 the LACJ system because ARANA was handling all of ULLOA's  
11 criminal activities while he was incarcerated.

12 297. On March 13, 2010, defendant FAZAH, speaking in coded  
13 language over the telephone, informed defendant ULLOA that FAZAH  
14 had an outstanding arrest warrant and could smuggle drugs into  
15 the LACJ system.

16 298. On March 13, 2010, defendant LOPEZ, speaking in coded  
17 language over the telephone, told defendant ULLOA that LOPEZ  
18 possessed additional heroin that could be smuggled into the LACJ  
19 system.

20 299. On March 13, 2010, defendant ULLOA, speaking in coded  
21 language over the telephone, informed defendant LOPEZ that ULLOA  
22 had two different shipments of drugs scheduled to be smuggled to  
23 ULLOA in custody.

24 300. On March 16, 2010, defendant ARANA, speaking in coded  
25 language over the telephone, told defendant ULLOA that  
26 defendants DORADO and GALVEZ and another F13 Gang member would  
27 be coming to her residence the following day to assist her  
28 preparations for the upcoming drug smuggling operation.



1        301. On March 17, 2010, defendant ARANA, speaking in coded  
2 language over the telephone, informed defendant ULLOA that  
3 defendant DORADO trusted defendant GALVEZ and wanted GALVEZ to  
4 be involved in their efforts to smuggle drugs into the LACJ  
5 system on March 18, 2010.

6        302. On March 17, 2010, defendant GALVEZ, speaking in coded  
7 language over the telephone, informed defendant ULLOA that  
8 GALVEZ was going to meet with defendant AYALA and would make  
9 sure that AYALA understood the importance of completing the  
10 delivery of drugs inside NCCF.

11       303. On March 17, 2010, defendant ULLOA, speaking in coded  
12 language over the telephone, confirmed with defendant GALVEZ  
13 that once defendant AYALA delivered drugs inside NCCF, AYALA  
14 would receive payment for smuggling these drugs.

15       304. On March 17, 2010, defendant GALVEZ, speaking in coded  
16 language over the telephone, advised defendant ULLOA that GALVEZ  
17 would accompany defendant AYALA to court when AYALA turned  
18 himself in to the authorities with drugs in his possession.

19       305. On March 17, 2010, defendant ARANA, speaking in coded  
20 language over the telephone, informed defendant ULLOA that  
21 defendant GALVEZ had arrived at ARANA's residence to package  
22 drugs.

23       306. On March 17, 2010, defendant ARANA, speaking in coded  
24 language over the telephone, told defendant ULLOA that defendant  
25 GALVEZ had not yet finished packaging the methamphetamine.

26       307. On March 17, 2010, defendant ARANA, speaking in coded  
27 language over the telephone, informed defendant ULLOA that  
28

1 defendant GALVEZ had finished packaging the drugs that were  
2 going to be smuggled into the LACJ system.

3 308. On March 17, 2010, defendant ULLOA, speaking in coded  
4 language over the telephone, provided instructions to defendant  
5 AYALA regarding what to do upon entering the LACJ system in  
6 possession of drugs.

7 309. On March 17, 2010, defendant AYALA, speaking in coded  
8 language over the telephone, confirmed with defendant ULLOA that  
9 their efforts to smuggle drugs into the LACJ system were taking  
10 place the following day.

11 310. On March 17, 2010, defendant ULLOA, speaking in coded  
12 language over the telephone, told defendant AYALA that defendant  
13 ARANA would drive AYALA to court the following day.

14 311. On March 18, 2010, defendants ARANA and GALVEZ and an  
15 unindicted co-conspirator entered the Los Angeles Metropolitan  
16 Courthouse on Hill Street, in Los Angeles, California, to assist  
17 defendant AYALA, who was attempting to smuggle drugs into the  
18 LACJ system.

19 312. On March 18, 2010, defendant AYALA possessed  
20 approximately 4.3 grams of methamphetamine, 25 grams of a  
21 mixture and substance containing a detectable amount of heroin,  
22 and 15.1 grams of marijuana at the Los Angeles Metropolitan  
23 Courthouse on Hill Street, in Los Angeles, California.

24 313. On March 18, 2010, defendant ARANA, speaking in coded  
25 language over the telephone, reported to defendant ULLOA that  
26 she and defendant GALVEZ had taken defendant AYALA to court to  
27 smuggle drugs into the LACJ system.

1           314. On March 18, 2010, defendant ULLOA, speaking in coded  
2 language over the telephone, advised defendant LOPEZ that  
3 defendant AYALA had entered a court facility in possession of  
4 drugs that were supposed to be delivered to ULLOA.

5           315. On March 18, 2010, defendant ARANA, speaking in coded  
6 language over the telephone, reported to defendant ULLOA that  
7 law enforcement had found the drugs that defendant AYALA had  
8 been trying to smuggle into the LACJ system.

9           316. On April 1, 2010, defendant ARANA, speaking in coded  
10 language over the telephone, informed defendant ULLOA that an  
11 unindicted co-conspirator had identified an individual who was  
12 wanted by the authorities and could smuggle drugs into the LACJ  
13 system for them and that the unindicted co-conspirator could  
14 supply them with methamphetamine.

15           317. On April 1, 2010, defendant ULLOA, speaking in coded  
16 language over the telephone, directed defendant ARANA to obtain  
17 any quantity of methamphetamine she could for smuggling into the  
18 LACJ system.

19           318. On April 1, 2010, defendant ULLOA, speaking in coded  
20 language over the telephone, asked defendant ARANA to explain to  
21 unindicted co-conspirators that defendant GALVEZ could wrap the  
22 drugs up in small enough quantities to be swallowed and smuggled  
23 into jail.

24           319. On April 15, 2010, defendant MARTINEZ, speaking in  
25 coded language over the telephone, informed defendant LOPEZ that  
26 an unindicted co-conspirator incarcerated at Ironwood State  
27 Prison wanted to order five ounces of heroin from them.

1        320. On April 15, 2010, defendant LOPEZ, speaking in coded  
2 language over the telephone, told defendant MARTINEZ what price  
3 to charge for heroin ordered by an inmate at Ironwood State  
4 Prison.

5        Fraudulent Scheme to Obtain Free Telephone Service

6        321. On February 18, 2010, defendants ULLOA and ARANA  
7 together called a telephone service provider, and ARANA  
8 represented that she was victim L.T. and asked the customer  
9 service representative to make sure that a telephone number  
10 could receive collect calls from correctional institutions.

11       322. On February 19, 2010, defendant ULLOA, using a  
12 telephone, informed defendant ARANA that she should keep  
13 changing the telephone numbers for each account in order to  
14 extend their ability to have free telephone service.

15       323. On February 21, 2010, defendant ULLOA, using a  
16 telephone, provided defendant ARANA with personal identifying  
17 information for three individuals to use in setting up telephone  
18 accounts.

19       324. On February 21, 2010, defendant ULLOA, using a  
20 telephone, provided defendant ARANA with seven addresses in  
21 Oxnard, California, to use in setting up telephone accounts.

22       325. On February 23, 2010, defendants ULLOA and ARANA  
23 together called a telephone service provider, and ARANA  
24 represented that she was victim L.T. and requested technical  
25 assistance with a telephone account obtained in the name of L.T.

26       326. On February 23, 2010, defendant ULLOA called a  
27 telephone service provider and, posing as victim R.A.A., checked  
28

1 on the status of an earlier request to initiate service and  
2 requested that calls be forwarded to another telephone number.

3 327. On March 2, 2010, defendant ULLOA called a telephone  
4 service provider and, posing as victim R.A.A., checked on the  
5 status of service to the telephone number obtained in the name  
6 of R.A.A.

7 328. On March 2, 2010, defendants ULLOA and ARANA called a  
8 telephone service provider, and ARANA, posing as victim L.T.,  
9 requested that the telephone line for the account in the name of  
10 L.T. be forwarded to a telephone number designated by ARANA.

11 329. On March 6, 2010, defendants ULLOA and ARANA called a  
12 telephone service provider, and ARANA, posing as victim A.P.,  
13 requested that calls to the account in the name of A.P. be  
14 forwarded to the telephone number designated by defendant ARANA.

15 330. On March 11, 2010, defendants ULLOA and ARANA called a  
16 telephone service provider, and ARANA, posing as victim E.M.,  
17 checked on the status of her prior request that two telephone  
18 lines for the account in E.M.'s name be forwarded to a telephone  
19 number designated by ARANA.

20 331. On March 13, 2010, defendant ULLOA, using a telephone,  
21 offered to allow two unindicted co-conspirators to participate  
22 in the plan to obtain free telephone service.

23 332. On March 14, 2010, defendant ULLOA, using a telephone,  
24 told defendant ARANA to research addresses in Sylmar,  
25 California, to use in the plan to obtain free telephone service.

26 333. On March 14, 2010, an unindicted co-conspirator  
27 provided defendants ULLOA and ARANA with personal identifying  
28

1 information for three victims to be used in the plan to obtain  
2 free telephone service.

3 334. On March 14, 2010, defendant ULLOA, speaking in coded  
4 language over the telephone, asked defendant ARANA to call an  
5 unindicted co-conspirator in order to obtain additional profiles  
6 containing victim identifying information.

7 335. On March 15, 2010, defendant ULLOA, using a telephone,  
8 told defendant ARANA to forward one of the previously obtained  
9 telephone accounts to a designated telephone number for use by  
10 an unindicted co-conspirator.

11 336. On March 18, 2010, defendants ULLOA and ARANA called a  
12 telephone service provider, and ARANA, posing as victim L.T.,  
13 requested that the telephone line for the account in the name of  
14 L.T. be forwarded to a telephone number designated by ARANA.

15 337. On March 21, 2010, defendant ULLOA, using a telephone,  
16 provided defendant ARANA with five addresses for use in setting  
17 up future telephone lines.

18 338. On March 21, 2010, defendant ULLOA, using a telephone,  
19 provided defendant ARANA with personal identifying information  
20 of three victims for use in the plan to obtain free telephone  
21 service.

22 339. On March 21, 2010, defendant ULLOA, speaking in coded  
23 language over the telephone, requested that defendant ARANA  
24 contact an unindicted co-conspirator in order to obtain  
25 additional profiles containing victim identifying information.

26 340. On March 22, 2010, defendants ULLOA and ARANA called a  
27 telephone service provider, and ARANA, posing as victim E.S.,  
28 requested a new telephone number under that identity.

1        341. On March 22, 2010, defendant ULLOA called a telephone  
2 service provider and, posing as victim A.F., requested a new  
3 telephone number for the account in the name of A.F.

4        342. On March 22, 2010, defendant ARANA, using a telephone,  
5 told defendant ULLOA that she had created three new telephone  
6 lines and that they now had a total of six to seven telephone  
7 lines available for use.

8        343. On March 22, 2010, defendant ULLOA, using a telephone,  
9 informed defendant ARANA that they would keep several of the  
10 telephone lines for their own use and would sell the rest.

11       344. On March 22, 2010, defendants ULLOA and ARANA called a  
12 telephone service provider, and ARANA requested that the  
13 telephone line in the name of victim L.T. be forwarded to a new  
14 telephone number designated by ARANA.

15       345. On March 23, 2010, defendant ULLOA, using a telephone,  
16 advised defendant ARANA that she should call a telephone service  
17 provider on another telephone line, so that the jail recording  
18 system would not capture the call.

19       346. On May 26, 2010, defendant ARANA maintained and  
20 possessed a spiral-bound notebook containing addresses and  
21 personal information used to set up telephone accounts,  
22 telephone numbers that those accounts were forwarded to, and the  
23 status of the accounts.

24       347. On May 30, 2011, defendant J. MEDINA, using a  
25 telephone, provided defendant ULLOA with the account information  
26 for the telephone account in the name of victim G.V.

27       348. On May 30, 2011, defendant J. MEDINA, using a  
28 telephone, provided defendant ULLOA with two addresses to be

1 used in connection with the plan to obtain free telephone  
2 service.

3 349. On May 30, 2011, defendant J. MEDINA, using a  
4 telephone, gave defendant ULLOA the personal identifying  
5 information of a victim for use in the plan to obtain free  
6 telephone service.

7 350. On May 30, 2011, defendant ULLOA called a telephone  
8 service provider and, posing as victim G.V., requested that  
9 calls to two lines in the name of G.V. be forwarded to telephone  
10 numbers designated by ULLOA.

11 351. On July 3, 2011, defendant MEDINA, using a telephone,  
12 advised defendant ULLOA about the status of a new telephone line  
13 she had set up as part of the plan to obtain free telephone  
14 service.

15 352. On July 6, 2011, defendant J. MEDINA, using a  
16 telephone, reported to defendant ULLOA that J. MEDINA had  
17 followed ULLOA's instructions to test one of the telephone lines  
18 by calling it to see if her call was forwarding as they had  
19 requested.

20 C. SPECIAL SENTENCING ALLEGATIONS

21 The Grand Jury further alleges that:

22 1. Beginning on a date unknown to the Grand Jury, and  
23 continuing to on or about August 1, 2013, in Los Angeles County,  
24 within the Central District of California, and elsewhere,  
25 defendants L. LAREDO, CERVANTES, LOPEZ, MARTINEZ, M. LAREDO,  
26 ESPINOZA, MAESTAS, JUAREZ, SIFUENTES, ULLOA, ARANA, J. MEDINA,  
27 DORADO, FAZAH, GALVEZ, AYALA, ACOSTA, GRANADOS, CAZERES,  
28 MANDUJANO, MENDEZ, AVILA, SANCHEZ, BECERRA, and BARRAZA, and



1 others known and unknown to the Grand Jury, conspired and agreed  
2 with each other to knowingly and intentionally commit the  
3 following offenses:

4 (a) To distribute at least 50 grams of  
5 methamphetamine, a Schedule II controlled substance, in  
6 violation of Title 21, United States Code, Sections 841(a)(1)  
7 and (b)(1)(A)(viii);

8 (b) To possess with intent to distribute at least 50  
9 grams of methamphetamine, a Schedule II controlled substance, in  
10 violation of Title 21, United States Code, Sections 841(a)(1)  
11 and (b)(1)(A)(viii);

12 (c) To distribute at least 1000 kilograms of a  
13 mixture and substance containing a detectable amount of  
14 marijuana, a Schedule I controlled substance, in violation of  
15 Title 21, United States Code, Sections 841(a)(1) and  
16 (b)(1)(A)(vii);

17 (d) To possess with intent to distribute at least  
18 1000 kilograms of a mixture and substance containing a  
19 detectable amount of marijuana, a Schedule I controlled  
20 substance, in violation of Title 21, United States Code,  
21 Sections 841(a)(1) and (b)(1)(A)(vii);

22 (e) To distribute at least one kilogram of a mixture  
23 and substance containing a detectable amount of heroin, a  
24 Schedule I narcotic drug controlled substance, in violation of  
25 Title 21, United States Code, Sections 841(a)(1) and  
26 (b)(1)(A)(i);

27 (f) To possess with intent to distribute at least one  
28 kilogram of a mixture and substance containing a detectable

1 amount of heroin, a Schedule I narcotic drug controlled  
2 substance, in violation of Title 21, United States Code,  
3 Sections 841(a)(1) and (b)(1)(A)(i).

4 (All in violation of Title 18, United States Code, Section  
5 1962(d).)

COUNT TWO

[18 U.S.C. § 1959(a)(3)]

1. At all times relevant to this Indictment, the F13 Gang, as described more particularly in Paragraphs One through Eleven of the Introductory Allegations of this Indictment, which paragraphs are hereby re-alleged and incorporated by reference as though fully set forth herein, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the F13 Gang, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving:

(a) the distribution of, possession with intent to distribute, and conspiracy to distribute and/or possess with intent to distribute, controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846;

(b) murder, in violation of California Penal Code Sections 21a, 31, 182, 187, 189, 190, and 664; and

(c) extortion, in violation of California Penal Code Sections 31, 182, 518, 519, 520, 664;

and acts indictable under:

1 (d) Title 18, United States Code, Section 1955 (illegal  
2 gambling); and

3 (e) Title 18, United States Code, Section 1343 (wire  
4 fraud).

5 3. On or about March 14, 2010, in Los Angeles County,  
6 within the Central District of California, for the purpose of  
7 maintaining and increasing position in the F13 Gang, an  
8 enterprise engaged in racketeering activity, defendant JOSUE  
9 ROJAS, also known as "Chino," and others known and unknown to  
10 the Grand Jury, assaulted victim R.A. resulting in serious  
11 bodily injury, in violation of California Penal Code Section  
12 245(a)(4).

13 (All in violation of Title 18, United States Code, Section  
14 1959(a)(3).)

COUNT THREE

[18 U.S.C. § 1959(a)(6)]

1-2. Paragraphs One and Two of Count Two of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

3. On or about March 14, 2010, in Los Angeles County, within the Central District of California, for the purpose of maintaining and increasing position in the F13 Gang, an enterprise engaged in racketeering activity, defendants JAVIER MANUEL ULLOA, also known as ("aka") "Yogi," JOSE DORADO, aka "Yogi," TANNOUS FAZAH, aka "Terist," and JOSUE ROJAS, aka "Chino," and others known and unknown to the Grand Jury, did unlawfully conspire to assault victim R.A. resulting in serious bodily injury, in violation of California Penal Code Sections 182 and 245(a)(4).

(All in violation of Title 18, United States Code, Section 1959(a)(6).)

COUNT FOUR

[21 U.S.C. § 846]

1. Paragraphs One through Eleven of the Introductory Allegations of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

2. Beginning on a date unknown to the Grand Jury, and continuing to on or about August 1, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendants L. LAREDO, CERVANTES, LOPEZ, MARTINEZ, M. LAREDO, ESPINOZA, MAESTAS, JUAREZ, SIFUENTES, ULLOA, ARANA, J. MEDINA, DORADO, FAZAH, GALVEZ, AYALA, ACOSTA, GRANADOS, CAZERES, MANDUJANO, MENDEZ, AVILA, SANCHEZ, BECERRA, BARRAZA, JESUS MEZA, aka "Chana" ("MEZA"), HAYDEE MEDINA ("H. MEDINA"), and DAVID PROO, aka "D" ("PROO"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit the following offenses:

(a) To distribute at least 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii);

(b) To possess with intent to distribute at least 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii);

(c) To distribute at least 1000 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of

1 Title 21, United States Code, Sections 841(a)(1) and  
2 (b)(1)(A)(vii);

3 (d) To possess with intent to distribute at least  
4 1000 kilograms of a mixture and substance containing a  
5 detectable amount of marijuana, a Schedule I controlled  
6 substance, in violation of Title 21, United States Code,  
7 Sections 841(a)(1) and (b)(1)(A)(vii);

8 (e) To distribute at least one kilogram of a mixture  
9 and substance containing a detectable amount of heroin, a  
10 Schedule I narcotic drug controlled substance, in violation of  
11 Title 21, United States Code, Sections 841(a)(1) and  
12 (b)(1)(A)(i);

13 (f) To possess with intent to distribute at least one  
14 kilogram of a mixture and substance containing a detectable  
15 amount of heroin, a Schedule I narcotic drug controlled  
16 substance, in violation of Title 21, United States Code,  
17 Sections 841(a)(1) and (b)(1)(A)(i);

18 (g) To distribute a mixture and substance containing  
19 a detectable amount of cocaine, a Schedule II narcotic drug  
20 controlled substance, in violation of Title 21, United States  
21 Code, Sections 841(a)(1) and (b)(1)(C);

22 (h) To possess with intent to distribute a mixture  
23 and substance containing a detectable amount of cocaine, a  
24 Schedule II narcotic drug controlled substance, in violation of  
25 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

26 ///

27 ///

28 ///

1 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE  
2 ACCOMPLISHED

3 1-13. The Grand Jury re-alleges and incorporates by  
4 reference as though fully set forth herein Paragraphs One  
5 through 13 of Section A of Count One of this Indictment.

6 14. Defendants J. MEDINA and H. MEDINA would obtain  
7 controlled substances and transport them across the border from  
8 Mexico for distribution in the United States.

9 15. Defendant MEZA, and others known and unknown to the  
10 Grand Jury, would supply defendant CERVANTES and other F13 Gang  
11 members and associates with distributable amounts of controlled  
12 substances.

13 16. Defendant PROO would assist defendant SIFUENTES by  
14 brokering drug transactions with prospective customers and would  
15 sell controlled substances supplied by SIFUENTES.

16 C. OVERT ACTS

17 In furtherance of the conspiracy, and to accomplish the  
18 objects of the conspiracy, defendants L. LAREDO, CERVANTES,  
19 LOPEZ, MARTINEZ, M. LAREDO, ESPINOZA, MAESTAS, JUAREZ,  
20 SIFUENTES, ULLOA, ARANA, J. MEDINA, H. MEDINA, DORADO, FAZAH,  
21 GALVEZ, AYALA, ACOSTA, GRANADOS, CAZERES, MANDUJANO, MENDEZ,  
22 AVILA, SANCHEZ, BECERRA, BARRAZA, MEZA, H. MEDINA, and PROO, and  
23 others known and unknown to the Grand Jury, committed and caused  
24 to be committed various overt acts, on or about the following  
25 dates, within the Central District of California, and elsewhere,  
26 including, but not limited to, the following:  
27  
28



1 1-353. The Grand Jury re-alleges and incorporates by  
2 reference as though fully set forth herein Paragraphs 1 through  
3 353 of Section B of Count One of this Indictment.

4 354. On July 25, 2011, defendant J. MEDINA, speaking in  
5 coded language over the telephone, informed defendant ULLOA that  
6 she was taking steps to make money they needed and that she had  
7 arranged with defendant H. MEDINA to transport methamphetamine  
8 from Mexico into the United States approximately a week later.

9 355. On July 30, 2011, defendants J. MEDINA and H. MEDINA  
10 left the Los Angeles area and traveled to Mexico in order to  
11 bring methamphetamine into the United States.

12 356. On or before August 2, 2011, defendants J. MEDINA and  
13 H. MEDINA obtained approximately 10,153.6 grams of  
14 methamphetamine that they intended to transport into the United  
15 States.

16 357. On August 2, 2011, defendants J. MEDINA and H. MEDINA  
17 possessed approximately 10,153.6 grams of methamphetamine, in a  
18 vehicle belonging to H. MEDINA, at the Otay Mesa port of entry  
19 in San Diego, California.

20 358. In or around November 2011, defendant J. MEDINA wrote,  
21 and attempted to send, a letter to defendant H. MEDINA seeking  
22 to coordinate their statements to law enforcement so that J.  
23 MEDINA could take the blame for the methamphetamine seizure on  
24 August 2, 2011.

COUNT FIVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about October 7, 2009, in Los Angeles County, within the Central District of California, defendant ALBERT SIFUENTES, also known as "Bluebird," knowingly and intentionally distributed at least five grams, that is, approximately 11.3 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SIX

[21 U.S.C. §§ 841(a)(1), (b)(1)(C)]

On or about March 2, 2010, in Los Angeles County, within the Central District of California, defendants ALBERT SIFUENTES, also known as ("aka") Bluebird, and DAVID PROO, aka "D," knowingly and intentionally distributed approximately 2.3 grams of methamphetamine, a Schedule II controlled substance.

COUNT SEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(b)(viii)]

On or about March 14, 2010, in Los Angeles County, within the Central District of California, defendant TANNOUS FAZAH, also known as "Terist," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 16.9 grams, of methamphetamine, a Schedule II controlled substance.

COUNT EIGHT

[21 U.S.C. §§ 841(a)(1), (b)(1)(C); 18 U.S.C. § 2(a)]

On or about March 18, 2010, in Los Angeles County, within the Central District of California, defendants JAVIER ULLOA, also known as ("aka") "Yogi," CELINA ARANA, JOSE DORADO, aka "Yogi," JOSE GALVEZ, aka "Pecas," and EDWARD AYALA, aka "Lalo," while aiding and abetting each other, knowingly and intentionally possessed with intent to distribute approximately 25 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic drug controlled substance.

COUNT NINE

[21 U.S.C. §§ 841(a)(1), (b)(1)(D); 18 U.S.C. § 2(a)]

On or about June 28, 2010, in Los Angeles County, within the Central District of California, defendants HECTOR MARTINEZ, also known as ("aka") "Liar-Liar," and JESSE BARRAZA, aka "Chapito," aka "Chapo," while aiding and abetting each other, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

COUNT TEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(D); 18 U.S.C. § 2(a)]

On or about November 8, 2010, in Los Angeles County, within the Central District of California, defendants JESUS CERVANTES, also known as ("aka") "B-Bad," aka "Jessica," aka "Estela," and JESUS MEZA, aka "Chana," knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

COUNT ELEVEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(D)]

On or about November 16, 2010, in Los Angeles County,  
within the Central District of California, defendant ARTURO  
MENDEZ, also known as "Picachu," knowingly and intentionally  
possessed with intent to distribute a mixture and substance  
containing a detectable amount of marijuana, a Schedule I  
controlled substance.



COUNT TWELVE

[21 U.S.C. §§ 841(a)(1), (b)(1)(D)]

On or about November 18, 2010, in Los Angeles County, within the Central District of California, defendant JULIAN BECERRA, also known as ("aka") "Julio," aka "Juan Pablo Perez," knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

COUNT THIRTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii); 18 U.S.C. § 2(a)]

On or about November 19, 2010, in Los Angeles County, within the Central District of California, defendants JESUS CERVANTES, also known as ("aka") "B-Bad," aka "Jessica," aka "Estela," JOSE GRANADOS, aka "Tricky," and JOSE CAZERES, aka "Pelon," while aiding and abetting each other, knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 10.4 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FOURTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about November 22, 2010, in Los Angeles County, within the Central District of California, defendant OSCAR OLIVERA AVILA, also known as ("aka") "Ruben Ramirez," aka "Oscar Olvera," aka "Rigo Perez Suarez," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 14.6 grams, of methamphetamine, a Schedule II controlled substance.

COUNT FIFTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about November 23, 2010, in Los Angeles County, within the Central District of California, defendants JESUS CERVANTES, also known as ("aka") "B-Bad," aka "Jessica," aka "Estela," and JOSE GRANADOS, aka "Tricky," knowingly and intentionally possessed with intent to distribute at least five grams, that is, approximately 5.6 grams, of methamphetamine, a Schedule II controlled substance.

COUNT SIXTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(D)]

On or about November 23, 2010, in Los Angeles County,  
within the Central District of California, defendant JESUS  
CERVANTES, also known as ("aka") "B-Bad," aka "Jessica," aka  
"Estela," knowingly and intentionally possessed with intent to  
distribute a mixture and substance containing a detectable  
amount of marijuana, a Schedule I controlled substance.

COUNT SEVENTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about February 25, 2011, in Los Angeles County, within the Central District of California, defendant MAX MAESTAS, also known as "Snow," knowingly and intentionally distributed at least five grams, that is, approximately 13.7 grams, of methamphetamine, a Schedule II controlled substance.

COUNT EIGHTEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about March 18, 2011, in Los Angeles County, within the Central District of California, defendant MAX MAESTAS, also known as "Snow," knowingly and intentionally distributed at least five grams, that is, approximately 27.6 grams, of methamphetamine, a Schedule II controlled substance.

COUNT NINETEEN

[21 U.S.C. §§ 841(a)(1), (b)(1)(B)(viii)]

On or about April 15, 2011, in Los Angeles County, within the Central District of California, defendants MAX MAESTAS, also known as ("aka") "Snow," and RENE JUAREZ, aka "Scrappy," knowingly and intentionally distributed at least five grams, that is, approximately 27.5 grams, of methamphetamine, a Schedule II controlled substance.



COUNT TWENTY

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about May 18, 2011, in Los Angeles County, within the Central District of California, defendants MAX MAESTAS, also known as ("aka") "Snow," and RENE JUAREZ, aka "Scrappy," knowingly and intentionally distributed at least 50 grams, that is, approximately 80 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TWENTY-ONE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about June 27, 2011, in Los Angeles County, within the Central District of California, defendant ALBERT SIFUENTES, also known as "Bluebird," knowingly and intentionally distributed at least 50 grams, that is, approximately 56 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TWENTY-TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(viii)]

On or about July 6, 2011, in Los Angeles County, within the Central District of California, defendant RENE JUAREZ, also known as "Scrappy," knowingly and intentionally distributed at least 50 grams, that is, approximately 109.7 grams, of methamphetamine, a Schedule II controlled substance.

COUNT TWENTY-THREE

[18 U.S.C. § 922(a)(1)(A)]

Between on or about October 8, 2009, and on or about October 14, 2011, in Los Angeles County, within the Central District of California, defendant ALBERT SIFUENTES, also known as "Bluebird," not being a licensed importer, licensed manufacturer, or licensed dealer, willfully engaged in the business of importing, manufacturing, and dealing in firearms, specifically, the sales of the following firearms on or about the following dates:

<u>DATE</u>	<u>FIREARM</u>
October 8, 2009	(1) A Smith & Wesson model SW9VE 9mm caliber pistol, bearing serial number PBU6848.
January 15, 2010	(1) A Luger Sten-type 9mm caliber machinegun, without a serial number.
July 11, 2011	(1) A Ruger model MK II Target .22 caliber pistol, bearing serial number 219-74002.
July 12, 2011	(1) A Glock model 23 .40 caliber pistol, bearing serial number LTR211;
	(2) A Llama Gabilondo & CIA model Omni 9mm caliber pistol, bearing serial number PA2091;
	(3) An Arcadia Machine & Tool California model Backup .380 caliber pistol, bearing serial number A34185;
	(4) A Ruger model P95DC 9mm caliber pistol, bearing serial number 313-29545.
August 3, 2011	(1) A Smith & Wesson model 22A .22 caliber pistol, bearing serial number UAY4273;
	(2) A Walther model P38 9mm caliber pistol, bearing serial number 021806E.

1	August 9, 2011	(1) A Springfield Armory model XD-40 .40
2		caliber pistol, bearing serial number
3		US432816.
4	August 18, 2011	(1) A Smith & Wesson .38 caliber revolver,
5		unknown model, bearing serial number 753514.
6	August 30, 2011	(1) A Marlin Firearms Company model 336CS
7		30/3WIN rifle, bearing serial number
8		10011379.
9	September 2, 2011	(1) A Norinco North China Industries model
10		NHM90 7.62 caliber rifle, bearing serial
11		number MS013867.
12	September 8, 2011	(1) An Israeli Military Industries model
13		Desert Eagle .40 caliber pistol, bearing
14		serial number 32316062;
15		(2) A Beretta USA Corp model 96 .40 caliber
16		pistol, bearing serial number BER221431;
17		(3) A Colt model MKIV/Series '80 Government
18		.380 Auto caliber semiautomatic pistol,
19		bearing serial number RC06813.
20	October 11, 2011	(1) A Heckler and Koch model P2000SK .40
21		caliber pistol, bearing serial number 122-
22		004997;
23		(2) A Taurus model PT24/7 PRO DS .40
24		caliber pistol, bearing serial number
25		SCR72435.
26	October 14, 2011	(1) A Beretta Pietro S.P.A model CX4 Storm
27		9mm caliber rifle, bearing serial number
28		CX06762;
		(2) A Mossberg model 500A 12-gauge shotgun,
		bearing serial number R904073.

COUNTS TWENTY-FOUR THROUGH THIRTY-FIVE

[18 U.S.C. § 922(g)(1)]

Between on or about October 8, 2009, and on or about October 14, 2011, in Los Angeles County, within the Central District of California, defendant ALBERTO SIFUENTES, also known as "Bluebird" ("SIFUENTES"), knowingly possessed the following firearms, on or about the following dates, in and affecting interstate and foreign commerce, after defendant SIFUENTES had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

(1) Possession of Marijuana for Sale, in violation of California Health and Safety Code Section 11359, in the Superior Court of the State of California, County of Los Angeles, case number BA218782, on or about July 16, 2001;

(2) Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11350(a), in the Superior Court of the State of California, County of Los Angeles, case number VA103543, on or about January 24, 2008.

<u>COUNT</u>	<u>DATE</u>	<u>FIREARM</u>
TWENTY-FOUR	October 8, 2009	Smith & Wesson model SW9VE 9mm caliber pistol, bearing serial number PBU6848.
TWENTY-FIVE	January 15, 2010	Luger Sten-type 9mm caliber machinegun, without a serial number.
TWENTY-SIX	July 11, 2011	Ruger model MK II Target .22 caliber pistol, bearing serial number 219-74002.

1	TWENTY- SEVEN	July 12, 2011	(1) Glock model 23 .40 caliber pistol, bearing serial number LTR211;
2			
3			(2) Llama Gabilondo & CIA model Omni 9mm caliber pistol, bearing serial number
4			PA2091;
5			(3) Arcadia Machine & Tool California model Backup .380 caliber pistol, bearing serial
6			number A34185; and
7			(4) Ruger model P95DC 9mm caliber pistol, bearing serial number 313-29545.
8			
9	TWENTY- EIGHT	August 3, 2011	(1) Smith & Wesson model 22A .22 caliber pistol, bearing serial number UAY4273; and
10			
11			(2) Walther model P38 9mm caliber pistol, bearing serial number 021806E.
12			
13	TWENTY- NINE	August 9, 2011	Springfield Armory model XD-40 .40 caliber pistol, bearing serial number US432816.
14	THIRTY	August 18, 2011	Smith & Wesson .38 caliber revolver, unknown model, bearing serial number
15			753514.
16			
17	THIRTY- ONE	August 30, 2011	Marlin Firearms Company model 336CS 30/3WIN rifle, bearing serial number 10011379.
18	THIRTY- TWO	September 2, 2011	Norinco North China Industries model NHM90 7.62 caliber rifle, bearing serial number
19			MS013867.
20			
21	THIRTY- THREE	September 8, 2011	(1) Israeli Military Industries model Desert Eagle .40 caliber pistol, bearing
22			serial number 32316062;
23			(2) Beretta USA Corp model 96 .40 caliber pistol, bearing serial number BER221431;
24			and
25			(3) Colt model MKIV/Series '80 Government .380 Auto caliber semiautomatic pistol,
26			bearing serial-number RC06813.
27			
28			

THIRTY- FOUR	October 11, 2011	(1) Heckler and Koch model P2000SK .40 caliber pistol, bearing serial number 122- 004997; and  (2) Taurus model PT24/7 PRO DS .40 caliber pistol, bearing serial number SCR72435.
THIRTY- FIVE	October 14, 2011	(1) Beretta Pietro S.P.A model CX4 Storm 9mm caliber rifle, bearing serial number CX06762; and  (2) Mossberg model 500A 12-gauge shotgun, bearing serial number R904073.



COUNT THIRTY-SIX

[18 U.S.C. § 922(g)(1)]

On or about March 14, 2010, in Los Angeles County, within the Central District of California, defendant TANNOUS FAZAH, also known as "Terist" ("FAZAH"), knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Marlin Glenfield model 60 .22 caliber semiautomatic rifle, bearing serial number 22428184;

(2) two (2) rounds of CCI/Speer Long Rifle .22 caliber ammunition; and

(3) 10 rounds of Remington Magnum .44 caliber ammunition.

Such possession occurred after defendant FAZAH had been convicted of the following felony crime punishable by a term of imprisonment exceeding one year: Possession of a Controlled Substance, in violation of California Health and Safety Code Section 11350(a), in the Superior Court of the State of California, County of Los Angeles, case number VA107994, on or about October 13, 2009.

COUNT THIRTY-SEVEN

[18 U.S.C. § 922(g)(1)]

On or about November 19, 2010, in Los Angeles County, within the Central District of California, defendant JOSE SANCHEZ, also known as "Trouble" ("SANCHEZ"), knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Hi-Point model C9 9mm caliber semiautomatic pistol, bearing serial number P194467;

(2) 19 rounds of Winchester 9mm caliber ammunition;

(3) six (6) rounds of Remington 9mm caliber ammunition;

(4) nine (9) rounds of Federal 9mm caliber ammunition;

(5) three (3) rounds of CCI/Speer 9mm caliber ammunition;

and

(6) six (6) rounds of Fiocchi 9mm caliber ammunition.

Such possession occurred after defendant SANCHEZ had been convicted of the following felony crime punishable by a term of imprisonment exceeding one year: Grand Theft from the Person of Another, in violation of California Penal Code Section 487(C), in the Superior Court of the State of California, County of Los Angeles, case number BA309370, on or about December 12, 2006.

COUNT THIRTY-EIGHT

[18 U.S.C. § 922(g)(1)]

On or about November 22, 2010, in Los Angeles County, within the Central District of California, defendant OSCAR OLIVERA AVILA, also known as ("aka") "Ruben Ramirez," aka "Oscar Olvera," aka "Rigo Perez Suarez" ("AVILA"), knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Bryco Arms model 59 9mm caliber pistol, bearing serial number 942343;

(2) a Smith & Wesson model 67 .38 caliber revolver, bearing serial number 6k68119;

(3) 15 rounds of 9mm caliber ammunition; and

(4) one (1) round of Fiocchi .38 caliber ammunition.

Such possession occurred after defendant AVILA had been convicted of the following felony punishable by a term of imprisonment exceeding one year: Possession for Sale - Cocaine, in violation of California Health and Safety Code Section 11351, in the Superior Court of the State of California, County of Santa Clara, case number 126340, on or about January 5, 1989.

COUNT THIRTY-NINE

[18 U.S.C. § 922(g)(1)]

On or about July 6, 2011, in Los Angeles County, within the Central District of California, defendant RENE JUAREZ, also known as "Scrappy" ("JUAREZ"), knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Rossi 12-gauge shotgun, unknown model, bearing serial number 84293;

(2) a Savage model 220A .410 bore shotgun, without a serial number;

(3) a Winchester model 1897 12-gauge shotgun, bearing serial number 449946; and

(4) five (5) rounds of Remington 12-gauge shotgun ammunition.

Such possession occurred after defendant JUAREZ had been convicted of at least one of the following felony crimes, each punishable by a term of imprisonment exceeding one year:

(1) Carrying a Loaded Firearm, Not Registered, in violation of California Penal Code Section 12031(A)(1), in the Superior Court of the State of California, County of Los Angeles, case number VA106843, on or about December 2, 2008;

(2) Possession of Firearm by a Felon, in violation of California Penal Code Section 12021(A)(1), in the Superior Court of the State of California, County of Los Angeles, case number VA113063, on or about January 5, 2010..

COUNT FORTY

[18 U.S.C. § 922(g)(5)]

On or about November 18, 2010, in Los Angeles County, within the Central District of California, defendant VICTOR ESPINOZA, also known as "Terco," who was then an alien illegally and unlawfully in the United States, knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Norinco model SKS 7.62 caliber rifle, bearing serial number 1614677;

(2) a Beretta model M9 9mm caliber pistol, bearing serial number M9-101145;

(3) four (4) rounds of Remington 7.62 caliber ammunition; and

(4) 10 rounds of Luger 9mm caliber ammunition.

COUNT FORTY-ONE

[18 U.S.C. § 922(g)(9)]

On or about November 18, 2010, in Los Angeles County, within the Central District of California, defendant VICTOR ESPINOZA, also known as "Terco" ("ESPINOZA"), knowingly possessed the following firearms and ammunition, in and affecting interstate and foreign commerce:

(1) a Norinco model SKS 7.62 caliber rifle, bearing serial number 1614677;

(2) a Beretta model M9 9mm caliber pistol, bearing serial number M9-101145;

(3) four (4) rounds of Remington 7.62 caliber ammunition; and

(4) 10 rounds of Luger 9mm caliber ammunition.

Such possession occurred after defendant ESPINOZA had been convicted of a misdemeanor crime of domestic violence, namely, Inflicting Corporal Injury on a Spouse or Cohabitant, in violation of California Penal Code Section 273.5(A), in the Superior Court of the State of California, County of Los Angeles, case number LAM8FF0425601, on or about November 24, 2008.

COUNT FORTY-TWO

[26 U.S.C. § 5861(d)]

On or about January 15, 2010, in Los Angeles County, within the Central District of California, defendant ALBERTO SIFUENTES, also known as "Bluebird" ("SIFUENTES"), knowingly possessed a firearm, namely, a Luger Sten-type 9mm caliber machinegun, bearing no serial number, which defendant SIFUENTES knew to be a machinegun as defined in Title 26, United States Code, Section 5845(b), and which had not been registered to defendant SIFUENTES in the National Firearms Registration and Transfer Record as required by Chapter 53, Title 26, United States Code.

COUNTS FORTY-THREE TO FORTY-FIVE

[18 U.S.C. §§ 1343, 2(a)]

A. INTRODUCTORY ALLEGATIONS

1. The Grand Jury hereby re-alleges and incorporates by reference the Introductory Allegations of this Indictment as though fully set forth herein.

B. THE SCHEME

2. Beginning on a date unknown to the Grand Jury, but by at least in or around January 2010, and continuing to in or around July 2011, in Los Angeles County, within the Central District of California, and elsewhere, defendants JAVIER MANUEL ULLOA, also known as ("aka") "Yogi" ("ULLOA"), CELINA ARANA ("ARANA"), and JESSENIA MEDINA ("J. MEDINA"), aided and abetted by others known and unknown to the Grand Jury, knowingly devised, participated in, and executed a scheme to defraud Verizon Telecommunications ("Verizon"), by means of false and fraudulent pretenses, representations, and promises, and transmitted and caused to be transmitted wire communications in interstate and foreign commerce for the purpose of executing the scheme.

3. The scheme operated as follows:

a. The Grand Jury hereby re-alleges and incorporates by reference Paragraph 13 of Section A of Count One of this Indictment.

b. Defendant ULLOA, who, at all times relevant to the scheme described herein, was an incarcerated inmate in the custody of the Los Angeles Sheriff's Department in the Los Angeles County Jail System, and defendants ARANA and J. MEDINA,



1 and others known and unknown to the Grand Jury, who were not  
2 incarcerated, would obtain personal identifying information --  
3 including names, addresses, dates of birth, and social security  
4 numbers -- belonging to victims.

5 c. Defendants ULLOA, ARANA, and J. MEDINA would  
6 obtain the addresses of homes that had been or were being  
7 foreclosed on and were likely to be vacant.

8 d. Defendants ARANA and J. MEDINA would use the  
9 telephone and a computer (through the Internet) to contact  
10 Verizon and request that an account be established and a home  
11 telephone landline be activated at the address of a foreclosed  
12 home, in the name of a victim without the victim's consent,  
13 knowledge, and authorization.

14 e. Once a fraudulent account was established,  
15 defendants ULLOA, ARANA, and J. MEDINA would call Verizon to  
16 request that call forwarding be activated for the account,  
17 specify the telephone number to which calls should be forwarded,  
18 and then make collect calls using the fraudulent account, with  
19 the intention that Verizon would not be paid for the collect  
20 calls. ULLOA would maintain the fraudulent accounts for his own  
21 personal use, sell accounts to other inmates, or allow other  
22 inmates to use the accounts free of charge.

23 f. To prevent Verizon from blocking collect calls on  
24 the fraudulent accounts, defendants ULLOA, ARANA, and J. MEDINA  
25 would call Verizon and request that the telephone number  
26 assigned to the fraudulent account be changed, which had the  
27 effect of increasing the dollar-limit of collect calls that  
28 Verizon would allow the accounts to accept on credit.

g. Defendant ARANA would maintain records of the personal identifying information of victims, the addresses used to set up the fraudulent accounts, the telephone numbers assigned by Verizon to the fraudulent accounts and reassigned at the request of ARANA and her co-schemers, the call forwarding telephone numbers for the various accounts, and the status of the fraudulent accounts and the actions that defendant ULLOA and ARANA needed to take with respect to those accounts.

C. THE EXECUTION OF THE SCHEME

4. To execute the above-described scheme, on or about the dates set forth below, within the Central District of California, and elsewhere, defendants ULLOA, ARANA, and J. MEDINA, while aiding and abetting each other, transmitted and caused to be transmitted the following communications, from California to another state, by means of wire:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>WIRE COMMUNICATION</u>	<u>DESTINATION</u>
FORTY-THREE	March 11, 2010	ULLOA ARANA	Telephone call to Verizon regarding ARANA's statements identifying herself as victim E.M. and requesting that two telephone lines in the name of E.M. be forwarded to ARANA's telephone.	Texas
FORTY-FOUR	March 22, 2010	ULLOA ARANA	Telephone call to Verizon regarding ARANA's statements identifying herself as victim L.T. and requesting that the telephone line in the name of L.T. be forwarded.	Texas

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

FORTY-FIVE	May 30, 2011	ULLOA J. MEDINA	Telephone call to Verizon regarding ULLOA's statements identifying himself as victim G.V. and requesting that two telephone lines in the name of G.V. be forwarded.	Missouri
------------	--------------	--------------------	---	----------

FORFEITURE ALLEGATION ONE

[18 U.S.C. § 1963]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963, in the event of any defendant's conviction under Count One of this Indictment.

2. Defendants shall forfeit to the United States the following property:

a. All right, title and interest in:

(1) any and all interest including, without limitation, any and all interest in any and all property (real, personal, tangible, intangible or otherwise) any person acquired or maintained in violation of Title 18, United States Code, Section 1962;

(2) any and all interest in, security of, claims against, or property or contractual right of any kind affording a source of influence over, any enterprise which any person established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and

(3) any and all property (real, personal, tangible, intangible or otherwise) constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Title 18, United States Code, Section 1962; and

///

1           b.    A sum of money equal to the total value of the  
2 property described in subsection a.  If more than one defendant  
3 is found guilty under Count One, each such defendant shall be  
4 jointly and severally liable for the entire amount forfeitable  
5 pursuant to that Count.

6           3.    Pursuant to Title 18, United States Code, Section  
7 1963(m), each defendant shall forfeit substitute property, up to  
8 the value of the money and property described in the preceding  
9 paragraph, if, as the result of any act or omission of a  
10 defendant, the property described in the preceding paragraph, or  
11 any portion thereof (a) cannot be located upon the exercise of  
12 due diligence; (b) has been transferred, sold to or deposited  
13 with a third party; (c) has been placed beyond the jurisdiction  
14 of the court; (d) has been substantially diminished in value; or  
15 (e) has been commingled with other property that cannot be  
16 divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 981(a)(1)(C), 21 U.S.C. §§ 853 and 881,  
and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Sections 853 and 881 and Title 28, United States Code, Section 2461(c), in the event of any defendant's conviction under any of Counts Four through Twenty-Two of this Indictment.

2. Defendants shall forfeit to the United States the following property:

a. All right, title and interest in any and all property, real or personal:

(1) constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of any offense set forth in any of Counts Four through Twenty-Two of this Indictment; and

(2) used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of any offense set forth in any of Counts Four through Twenty-Two of this Indictment; and

b. A sum of money equal to the total value of the property described in subsection a. For each of Counts Four through Twenty-Two for which more than one defendant is found guilty, each such defendant shall be jointly and severally liable for the entire amount forfeited pursuant to that Count.

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), each defendant shall forfeit substitute property, up to the value of the money and property described in the preceding paragraph, if, as the result of any act or omission of a defendant, the property described in the preceding paragraph, or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

15 /  
Foreperson

ANDRÉ BIROTTE JR.  
United States Attorney

ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Criminal Division

ELIZABETH R. YANG  
Assistant United States Attorney  
Chief, Violent & Organized Crime Section

TERRENCE P. MANN  
JOSHUA A. KLEIN  
Assistant United States Attorneys  
Violent & Organized Crime Section